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# Transcript of Yulonda Wyche

**Date:** April 23, 2021

**Case:** Flores -v- Virginia Department of Corrections

**Planet Depos**

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## Transcript of Yulonda Wyche

1 (1 to 4)

Conducted on April 23, 2021

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION

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JOYCE FLORES,

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Plaintiff,

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vs.

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VIRGINIA DEPARTMENT OF CORRECTIONS,

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Defendant.

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CONTAINS CONFIDENTIAL INFORMATION

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DEPOSITION OF YULONDA WYCHE

14

Conducted Virtually

15

Richmond, Virginia

16

April 23, 2021

17

1:12 p.m. EST

18

19

Job No.: 367574

20

Pages: 177

21

Reported by: Valerie Smith Green

22

1

INDEX OF EXAMINATIONS

2

YULONDA WYCHE

3

Examination by Mr. Alabella:

4

Examination by Mr. Regnery:

5

6

PREVIOUSLY MARKED EXHIBITS REFERENCED

7

NO.

8

Exhibit

9

Adani Security X ray Screening  
System Statewide Training  
(CONFIDENTIAL)

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Also Present:

Joyce Flores Plaintiff

John Woodson

Planet Depos IT Technician

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PROCEEDINGS

1:12 p.m. EST

THE COURT REPORTER: Will counsel

please stipulate that in lieu of formally

swearing in the witness, the reporter will

instead ask the witness to acknowledge that

their testimony will be true under the

penalties of perjury, that counsel will not

object to the admissibility of the transcript

based on proceeding in this way, and that the

witness has verified that she is in fact

Yulonda Wyche.

ALL COUNSEL: (All counsel agree.)

THE COURT REPORTER: Ms. Wyche, do

you hereby acknowledge that your testimony will

be true under the penalties of perjury?

THE WITNESS: I do.

YULONDA WYCHE,

having declared to provide truthful testimony, was

examined and testified as follows:

EXAMINATION

Transcript of Yulonda Wyche

2 (5 to 8)

Conducted on April 23, 2021

<p>5</p> <p>1 BY MR. FALABELLA:</p> <p>2 Q. Good afternoon, Ms. Wyche. My name is</p> <p>3 Paul Falabella. I'm a lawyer in Richmond with the</p> <p>4 law firm of Butler Curwood. I represent Joyce</p> <p>5 Flores in a lawsuit that she's brought in the</p> <p>6 United States District Court for the Western</p> <p>7 District of Virginia, Harrisonburg Division</p> <p>8 alleging sex discrimination against the Virginia</p> <p>9 Department of Corrections. Do you understand I'm</p> <p>10 here today in that capacity?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Okay. You've heard some of these</p> <p>13 instructions already but I will remind you of them</p> <p>14 again. And that is it's important to give verbal</p> <p>15 answers rather than head nods or gestures so that</p> <p>16 our court reporter can get an accurate</p> <p>17 transcription of the proceedings today. Does that</p> <p>18 make sense?</p> <p>19 A. Yes, sir.</p> <p>20 Q. All right. I will ask that you let me</p> <p>21 finish a question before you start your answer and</p> <p>22 I will endeavor to return the courtesy. Does that</p>	<p>7</p> <p>1 A. [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 (This concludes the confidential portion.)</p> <p>4 Q. Thank you.</p> <p>5 And what is the highest level of</p> <p>6 education you've obtained?</p> <p>7 A. High school graduate, some college.</p> <p>8 Q. Okay. When did you graduate high</p> <p>9 school?</p> <p>10 A. 1996.</p> <p>11 Q. All right. And what high school?</p> <p>12 A. Jane Adams Business Career Center in</p> <p>13 Cleveland, Ohio.</p> <p>14 Q. And what college have you taken?</p> <p>15 A. Alabama A&amp;M. I majored in business</p> <p>16 logistics. I also went to Southside Community</p> <p>17 College and I got a certificate in phlebotomy.</p> <p>18 Q. Okay. A certificate in what?</p> <p>19 A. Phlebotomy, phlebotomist.</p> <p>20 Q. What's phlebotomy? I don't know.</p> <p>21 A. Blood drawing. A lab tech drawing</p> <p>22 blood.</p>
<p>6</p> <p>1 make sense?</p> <p>2 A. Yes, sir.</p> <p>3 Q. All right. I don't expect us to be</p> <p>4 together for a long time this afternoon but if at</p> <p>5 any point we need breaks that's totally fine. I</p> <p>6 just ask that we not take a break when a question</p> <p>7 is pending or a series of questions that we need</p> <p>8 to complete. Does that make sense?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Great. Could I have your name for the</p> <p>11 record?</p> <p>12 A. Yes, Yulonda Wyche.</p> <p>13 Q. All right. And you've heard me say</p> <p>14 this already today but I'll say it again here on</p> <p>15 the record. We have a protective order in this</p> <p>16 case whereby we can designate certain information</p> <p>17 as confidential not to be publically filed. I'm</p> <p>18 going to designate this question and answer under</p> <p>19 the protective order.</p> <p>20 (The following portion was designated</p> <p>21 confidential.)</p> <p>22 Q. [REDACTED]</p>	<p>8</p> <p>1 Q. Gotcha. Okay. But no degree from</p> <p>2 either institution?</p> <p>3 A. Correct.</p> <p>4 Q. When did you leave the school in</p> <p>5 Alabama?</p> <p>6 A. 1999.</p> <p>7 Q. Okay. And when did you last take any</p> <p>8 courses at Southside Community College?</p> <p>9 A. I want to say around 2016 I believe --</p> <p>10 Q. Okay.</p> <p>11 A. -- approximately.</p> <p>12 Q. Sure. Do you have any other</p> <p>13 professional license or certifications beyond a</p> <p>14 driver's license?</p> <p>15 A. I have professional certifications</p> <p>16 through the department, yes.</p> <p>17 Q. Okay. What are those?</p> <p>18 A. I have basic correctional's officer. I</p> <p>19 was a correctional officer in 2002. And then I</p> <p>20 also have institutional investigator. I graduated</p> <p>21 from that school in 2007.</p> <p>22 Q. Okay.</p>

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Transcript of Yulonda Wyche

3 (9 to 12)

Conducted on April 23, 2021

<p style="text-align: center;">9</p> <p>1 A. In 2008 with Virginia State Police I 2 received my VCN certification which is the 3 Virginia Criminal Network. 4 Q. Okay. 5 A. In 2014 I received my certified 6 corrections manager certification through ACA 7 which is the American Correctional Association. 8 Q. Okay. 9 A. And then in 2018 I believe I also 10 received certification from the Correctional 11 Management Institute at VCU. 12 Q. Okay. 13 A. In addition to that in 2016 I became a 14 certified operator through Adani. And I believe 15 sometime in 2017 at the end towards 2017 I also 16 received certification through Adani again as a 17 certified train the trainer. 18 Q. I'm sorry I dropped one of those words. 19 A certified what trainer? 20 A. Train the trainer. So I'm able to 21 train other trainers. 22 Q. Gotcha. Okay. I'll back you up before</p>	<p>1 physically there. It was given through PowerPoint 2 presentation. We actually had to take a test as 3 well and then we had to go do hands-on. 4 Q. Okay. And how many folks at 5 Greenville got that training? 6 A. Oh, I honestly cannot recall. There 7 were several. 8 Q. Okay. More than 20 folks? 9 A. I honestly cannot recall. 10 Q. Okay. More than ten folks? 11 A. I honestly -- 12 MR. REGNERY: Asked and answered. 13 You can answer if you know. 14 A. I don't know. 15 Q. More than two folks? 16 A. Yes, more than two. 17 Q. Okay. More than five? 18 A. Honestly beyond that I don't -- I don't 19 know how many was in the class. 20 Q. Okay. 21 A. I remember it was quite a few of us. 22 Q. Okay. And so you were in a -- where</p>
<p style="text-align: center;">0</p> <p>1 the Adani stuff. The 2018 I caught correctional 2 but what was that certification? 3 A. Commonwealth -- it was the Commonwealth 4 Management Institute through VCU. 5 Q. Okay. 6 A. It's a certification not a diploma. 7 Q. Right. A certification for what? 8 A. Management. 9 Q. Okay. All right. The 2016 -- 10 pronounce it for me again the company Adani? 11 A. Adani. 12 Q. Adani. Adani. Okay. The 2016 Adani 13 certification what did you do to earn that? 14 A. I had to take a course that was 15 instructed or led by the company itself. That was 16 during the initial installation of the equipment 17 at the facility I was currently working at. And 18 at the time that was Greenville Correctional 19 Center. 20 Q. Okay. Was that an online course, an in 21 person course? How was that -- 22 A. No. No, it was in person. They were</p>	<p style="text-align: center;">2</p> <p>1 were you? Were you in a classroom? 2 A. We were in a conference room at 3 Greenville Correctional Center. 4 Q. Okay. And how long did the training 5 last? 6 A. I believe it was all day. 7 Q. Okay. And at the time were you in the 8 institutional investigator role? 9 A. No. 10 Q. What role were you in? 11 A. Lieutenant I believe. Correctional 12 lieutenant. 13 Q. Okay. And what were your job duties at 14 that time? 15 A. To oversee the operations of the shift. 16 I was a watch commander. 17 Q. Okay. Did you oversee the front 18 security operations? 19 A. I did. 20 Q. Okay. After that training did you 21 operate the Adani machine? 22 A. Yes, on several occasions.</p>

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Transcript of Yulonda Wyche

4 (13 to 16)

Conducted on April 23, 2021

<p>3</p> <p>1 Q. Okay. Did you ever see folks who</p> <p>2 operated the scanner?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Okay. All right. Then in 2017 there</p> <p>5 was the train the trainer certification. Was that</p> <p>6 in person or online?</p> <p>7 <b>A. That was actually in person as well.</b></p> <p>8 Q. Okay. Where did that occur?</p> <p>9 <b>A. That was here in headquarters.</b></p> <p>10 Q. Okay. And here is Richmond?</p> <p>11 <b>A. Yes. Sorry.</b></p> <p>12 Q. Okay. That's okay. All right. And</p> <p>13 how long did that last?</p> <p>14 <b>A. That also took the entire day.</b></p> <p>15 Q. Okay. How many folks were in that</p> <p>16 class?</p> <p>17 <b>A. Myself and the instructor.</b></p> <p>18 Q. Okay. One on one?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Okay. Was -- who was the instructor?</p> <p>21 <b>A. Brandon Trumbo.</b></p> <p>22 Q. And who does Brandon work for?</p>	<p>5</p> <p>1 <b>and the use of the machine.</b></p> <p>2 Q. Okay. Since 2017 when you received</p> <p>3 that certification have you had occasion to train</p> <p>4 others on the use of the Adani scanners?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Okay. How often do you do that?</p> <p>7 <b>A. I've had several -- several trainings.</b></p> <p>8 <b>We currently have now 14 facilities equipped with</b></p> <p>9 <b>it and a mobile unit. At the time in question</b></p> <p>10 <b>today there were 11 facilities that had the</b></p> <p>11 <b>equipment. So I've offered various training that</b></p> <p>12 <b>way. I've also assisted our academy with creating</b></p> <p>13 <b>online training which all operators take annually</b></p> <p>14 <b>as well. And I take it annually as well.</b></p> <p>15 Q. Okay. So I know you said several or</p> <p>16 numerous and I know it's hard to quantify. But</p> <p>17 have you done training -- have you given training</p> <p>18 more than ten times?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Okay. More than 50 times?</p> <p>21 <b>A. Again, I can't tell you the exact</b></p> <p>22 <b>number.</b></p>
<p>4</p> <p>1 <b>A. For Adani. And I believe his</b></p> <p>2 <b>supervisor is Martin Gregorio.</b></p> <p>3 Q. Okay. Was Mr. Gregorio there?</p> <p>4 <b>A. He -- he came to Virginia but I don't</b></p> <p>5 <b>recall him being present through the entire</b></p> <p>6 <b>training.</b></p> <p>7 Q. Okay. Is Brandon based in Virginia or</p> <p>8 out of state?</p> <p>9 <b>A. They are out of state.</b></p> <p>10 Q. And that's Texas?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Okay. Were there any materials for</p> <p>13 that train the trainer training?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Do you still have those materials?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Okay. And then you've probably heard</p> <p>18 me say earlier in the day I think I know but I</p> <p>19 will ask because that's the purpose of our time</p> <p>20 together. What does train the trainer mean?</p> <p>21 <b>A. It means I receive training and that's</b></p> <p>22 <b>enough to be able to train others on the operation</b></p>	<p>6</p> <p>1 Q. Sure. More than 25 times?</p> <p>2 <b>A. I don't have the exact number. It's</b></p> <p>3 <b>been frequently though.</b></p> <p>4 Q. Okay. So all you know for sure is more</p> <p>5 than ten?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Okay. So it could be 11?</p> <p>8 <b>A. Or more.</b></p> <p>9 Q. Okay. All right. So we're up to we</p> <p>10 know 11 for sure. 15 or more?</p> <p>11 <b>A. I'm not -- I'm honestly not sure --</b></p> <p>12 <b>Q. Okay.</b></p> <p>13 <b>A. -- the exact amounts.</b></p> <p>14 Q. Okay. All right. Are there materials</p> <p>15 that you use when you are training others?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Okay. Are those materials that you</p> <p>18 developed or that were developed by Adani?</p> <p>19 <b>A. So I have a combination of both, Adani</b></p> <p>20 <b>developed materials and then there's a training</b></p> <p>21 <b>that I developed in collaboration with the</b></p> <p>22 <b>company.</b></p>

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Transcript of Yulonda Wyche

5 (17 to 20)

Conducted on April 23, 2021

<p>7</p> <p>1 Q. Okay. And is that training that you</p> <p>2 developed in collaboration with the company</p> <p>3 specific to contraband or is that separate</p> <p>4 materials we're talking about?</p> <p>5 <b>A. It's comprised of specific to</b></p> <p>6 <b>contraband, actual images from the machines that</b></p> <p>7 <b>we actually have. Also we insert some information</b></p> <p>8 <b>on policy briefly just so that they know the rules</b></p> <p>9 <b>that govern the use of it as well as some</b></p> <p>10 <b>information as operation use and other information</b></p> <p>11 <b>provided by the company.</b></p> <p>12 Q. Okay. We'll probably look at them in</p> <p>13 more depth a bit later on but I just want to make</p> <p>14 sure I'm on the same page with you so let me show</p> <p>15 you this.</p> <p>16 (Document shared on screen.)</p> <p>17 Q. This has previously been marked as</p> <p>18 Exhibit One. Is this the training materials that</p> <p>19 you developed in collaboration with Adani?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Okay. All right. Who at Adani helped</p> <p>22 you develop these materials?</p>	<p>9</p> <p>1 <b>A. His input provided was based on the</b></p> <p>2 <b>radiation dosing, the amount of radiation, the</b></p> <p>3 <b>chart that you saw that tells you in comparison to</b></p> <p>4 <b>some of your outsider consumer products. It was a</b></p> <p>5 <b>lot of the technical images that he provided.</b></p> <p>6 Q. Okay. And what was Mr. Kidd's</p> <p>7 contribution?</p> <p>8 <b>A. Mr. Kidd was very helpful in obtaining</b></p> <p>9 <b>those images from the various machines. He</b></p> <p>10 <b>himself was an operator as well at the time and an</b></p> <p>11 <b>investigator at the time. So he was able to also</b></p> <p>12 <b>provide his hands-on knowledge and experience with</b></p> <p>13 <b>operating the machine.</b></p> <p>14 Q. Okay. Did you obtain any of the images</p> <p>15 used in the slides?</p> <p>16 <b>A. Not physically obtained but, yes, I</b></p> <p>17 <b>have inserted images based upon images that was</b></p> <p>18 <b>either shown or sent to me, yes.</b></p> <p>19 Q. Okay. All right. Any other training</p> <p>20 or certification that you've received from Adani?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Okay. Let's just back up a minute to</p>
<p>8</p> <p>1 <b>A. Martin Gregorio.</b></p> <p>2 MR. REGNER: Mark -- I'm sorry,</p> <p>3 Paul. I just wanted again note and I would</p> <p>4 designate already but just to be safe that</p> <p>5 it's been designated as confidential</p> <p>6 according to the protective order so that</p> <p>7 document as well as all testimony related to</p> <p>8 it wish to keep that confidential.</p> <p>9 Q. Okay. When did you develop these</p> <p>10 materials?</p> <p>11 <b>A. I can't say the exact date, but I want</b></p> <p>12 <b>to say if I were to get close it would be towards</b></p> <p>13 <b>the end of 2018, maybe the beginning of 2019.</b></p> <p>14 Q. Okay. And then I've noticed that Jamie</p> <p>15 Kidd is on these materials as well. Did he help</p> <p>16 develop them at all?</p> <p>17 <b>A. He did, yes.</b></p> <p>18 Q. Anybody else besides Mr. Gregorio,</p> <p>19 Mr. Kidd and yourself?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Okay. What input did Mr. Gregorio</p> <p>22 provide to the materials?</p>	<p>20</p> <p>1 what your current job is.</p> <p>2 <b>A. Sure. I am the statewide security</b></p> <p>3 <b>program coordinator for the department.</b></p> <p>4 Q. Okay. And what are your job duties?</p> <p>5 <b>A. I am involved in the security readiness</b></p> <p>6 <b>assessments, post audit staff and studies, policy</b></p> <p>7 <b>variances as well as overseer of the compliance</b></p> <p>8 <b>and use of the Adani body scanners.</b></p> <p>9 Q. Okay. And what was your position in</p> <p>10 July 2019?</p> <p>11 <b>A. I was the statewide central visitation</b></p> <p>12 <b>and offender drug testing manager for both</b></p> <p>13 <b>institutions and community P&amp;P as well as the</b></p> <p>14 <b>Adani body scanner compliance manager.</b></p> <p>15 Q. Okay. On the first part statewide</p> <p>16 manager part what were your job duties?</p> <p>17 <b>A. For the visitation unit our visitation</b></p> <p>18 <b>unit is centralized unit where all applicants or</b></p> <p>19 <b>visitors wishing to apply to come visit offenders</b></p> <p>20 <b>are processed through that unit. And I was the</b></p> <p>21 <b>manager of the staff that processed and conduct</b></p> <p>22 <b>the background checks for those visitor</b></p>

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Transcript of Yulonda Wyche

6 (21 to 24)

Conducted on April 23, 2021

<p style="text-align: right;">2</p> <p>1 applications.</p> <p>2 Q. And then I forget how you specifically</p> <p>3 referred to it but --</p> <p>4 A. Offender drug testing.</p> <p>5 Q. Yeah.</p> <p>6 A. The offender drug testing for</p> <p>7 facilities, institutions and community P&amp;P. I was</p> <p>8 the liaison between the department and the state</p> <p>9 laboratory which is DCLS. The laboratory are the</p> <p>10 ones that actually conduct the testing of the</p> <p>11 samples -- the urine samples that are submitted as</p> <p>12 well as the policy content.</p> <p>13 Q. All right. And then last part was the</p> <p>14 Adani --</p> <p>15 A. Compliance, yes.</p> <p>16 Q. Compliance.</p> <p>17 A. Yes. So I was responsible for --</p> <p>18 actually being the liaison again for the</p> <p>19 department and the company, making sure the</p> <p>20 installs and the purchases were made in accordance</p> <p>21 with policy, going around the facilities checking</p> <p>22 to make sure that they were operating them in</p>	<p style="text-align: right;">23</p> <p>1 Q. Okay. And when you weren't on site</p> <p>2 when they were sent to you how would they be sent</p> <p>3 to you?</p> <p>4 A. Majority of the time it was via e-mail.</p> <p>5 There was an occasion I can recall receiving them</p> <p>6 via text on my state cell phone.</p> <p>7 Q. Okay.</p> <p>8 A. Or being shown in person.</p> <p>9 Q. All right. And so you can send images</p> <p>10 directly from the Adani machine to an e-mail?</p> <p>11 A. No. You will have to capture it via</p> <p>12 picture from another device.</p> <p>13 Q. Okay. So anything you would see would</p> <p>14 be a picture of a picture?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Is there any way to send images</p> <p>17 directly from the body scanners to an e-mail?</p> <p>18 A. No because we're not -- our computers</p> <p>19 are not networked. They're not connected to the</p> <p>20 network.</p> <p>21 Q. Okay. And so I've heard that referred</p> <p>22 to, and you might have heard earlier today, as a</p>
<p style="text-align: right;">22</p> <p>1 accordance with policy and the manufacturer's</p> <p>2 instructions and providing training on and</p> <p>3 answering any other questions, inquiries or</p> <p>4 concerns.</p> <p>5 Q. Okay. All right. In that Adani</p> <p>6 liaison role did you have any duties to review</p> <p>7 scans for contraband?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Tell me how that would work.</p> <p>10 Would inquiries from all over the state come into</p> <p>11 your office there in Richmond or just when you</p> <p>12 were out on site you would consult? How -- how</p> <p>13 would it work?</p> <p>14 A. It was a combination of both. If I was</p> <p>15 conducting a site visit and there was something</p> <p>16 someone wanted me to look at they would bring it</p> <p>17 to my attention. Also while doing the site visits</p> <p>18 sometimes I will just go back and review scans to</p> <p>19 see if we may or may not be missing things. And</p> <p>20 then a lot of times or the majority of the times</p> <p>21 it will be scans being shown or sent to me from</p> <p>22 various facilities, so all across the state.</p>	<p style="text-align: right;">24</p> <p>1 closed system?</p> <p>2 A. Uh-huh.</p> <p>3 Q. Is that a term that you use?</p> <p>4 A. No, we don't use that term but I</p> <p>5 understand it.</p> <p>6 Q. Okay. What does that mean to you?</p> <p>7 A. Meaning that it is specific to that</p> <p>8 stand-alone system and cannot go outside of it.</p> <p>9 Q. Okay. Yeah, there's no way like --</p> <p>10 well, I guess let me just ask you the direct</p> <p>11 question. Can you plug a USB drive into the</p> <p>12 machine and take images off that way?</p> <p>13 A. You can plug a USB drive into the</p> <p>14 machine.</p> <p>15 Q. Okay. Have you done that?</p> <p>16 A. No.</p> <p>17 Q. Okay. Have you ever received images</p> <p>18 via a USB drive?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. All right. In terms of what we</p> <p>21 were talking about a minute ago you receiving</p> <p>22 pictures of pictures. When you received that</p>

Transcript of Yulonda Wyche

7 (25 to 28)

Conducted on April 23, 2021

<p style="text-align: right;">25</p> <p>1 you're just looking at kind of the image. Is  2 there any identification of who that image is of  3 whether it be a visitor or -- or a staff member?  4 MR. REGNERY: Just gonna note an  5 objection just to form and foundation.  6 You can answer.  7 <b>A. Sometimes they will identify the name</b>  8 <b>and often times they don't.</b>  9 Q. So it might -- you know, they might put  10 in the e-mail the name. But I guess on the image  11 itself is there any name?  12 <b>A. Depends on how the picture was taken of</b>  13 <b>the screen.</b>  14 Q. Okay. And so, you know, I haven't  15 personally seen one of these machines. Is there a  16 view of the screen that would include identifying  17 information?  18 <b>A. Yes.</b>  19 Q. Okay. And is there also a view of the  20 screen that would -- is there a separate screen  21 that doesn't have identifying information?  22 <b>A. So we have dual screens and --</b></p>	<p style="text-align: right;">27</p> <p>1 policy if a personal cell phone was used to take  2 that picture?  3 <b>A. Yes.</b>  4 MR. REGNERY: Note an objection to  5 form and foundation and to speculation.  6 You can answer.  7 <b>A. Yes.</b>  8 MR. REGNERY: You can answer.  9 <b>A. It is not the expectation that personal</b>  10 <b>cell phones be used.</b>  11 (Interruption.) (Court Reporter requests  12 clarification for the record.)  13 <b>A. I said yes, it is not the expectation</b>  14 <b>that personal cell phones be used.</b>  15 Q. Okay. I've heard some testimony on  16 this but obviously you're quite knowledgeable so I  17 will ask you. In terms of storing images from  18 scans my understanding is that the machines are  19 able to keep kind of a historical record of an  20 individual's scans. Is that accurate?  21 <b>A. Yes.</b>  22 Q. Okay. Do you know how far back that</p>
<p style="text-align: right;">26</p> <p>1 Q. Okay.  2 <b>A. -- so on one side it's a full view and</b>  3 <b>it's called the working window. And on that</b>  4 <b>working window just slightly to the right of the</b>  5 <b>image is identifying information. A lot of times</b>  6 <b>though when they take the picture they may not</b>  7 <b>capture that because it's so far to the right that</b>  8 <b>you won't get -- you might possibly not get a full</b>  9 <b>image or picture of the image.</b>  10 Q. Okay.  11 <b>A. So they would more likely than not just</b>  12 <b>take a picture of the image itself and sometimes</b>  13 <b>that might cause the name to the right to be</b>  14 <b>missing.</b>  15 Q. Gotcha. Okay. In your experience what  16 are they using to take that picture of the screen?  17 <b>A. I've seen personal -- well, not</b>  18 <b>personal but state issued cell phones used as well</b>  19 <b>as cameras.</b>  20 Q. Okay. And state issued cameras?  21 <b>A. Yes.</b>  22 Q. Okay. Would it be a violation of</p>	<p style="text-align: right;">28</p> <p>1 historical record goes?  2 <b>A. To my knowledge it's not really date</b>  3 <b>specific but it's more based upon storage. So I'm</b>  4 <b>told like maybe the system has one terabyte. So</b>  5 <b>however many images it takes to get to that</b>  6 <b>storage capacity determines when the images begin</b>  7 <b>to fall off or not. So it's not date specific.</b>  8 Q. Okay. And have -- in your experience  9 have you dealt with any machines that reached the  10 terabyte or whatever the capacity is and then  11 started deleting images?  12 <b>A. I can't say that. Not to my knowledge,</b>  13 <b>no.</b>  14 Q. Okay. Are you aware of any storage  15 issues at the body scan machine at Augusta?  16 <b>A. Yes.</b>  17 Q. Okay. What's your understanding of  18 what may have happened with the storage of images  19 at Augusta?  20 <b>A. I recall them having a repair needed</b>  21 <b>and then afterwards them inquiring about whether</b>  22 <b>some images could be recovered because they were</b></p>

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Transcript of Yulonda Wyche

8 (29 to 32)

Conducted on April 23, 2021

<p style="text-align: right;">29</p> <p>1 <b>unable to come back up once that repair was made.</b></p> <p>2 Q. Okay. Do you have a recollection of</p> <p>3 when that occurred?</p> <p>4 <b>A. I want to say maybe the end of 2019.</b></p> <p>5 <b>It was definitely around that year though.</b></p> <p>6 Q. Okay. And do you have a recollection</p> <p>7 of whether all images were -- were unrecoverable</p> <p>8 or only a subset of images were unrecoverable?</p> <p>9 <b>A. I don't.</b></p> <p>10 Q. Okay. Who would know?</p> <p>11 MR. REGNER: Note an objection to</p> <p>12 the extent it calls for speculation.</p> <p>13 You can answer.</p> <p>14 <b>A. I don't know. It would have to</b></p> <p>15 <b>probably be someone at the facility.</b></p> <p>16 Q. Okay. Is there a Adani liaison -- or</p> <p>17 strike that.</p> <p>18 Who's in charge of the Adani machine at</p> <p>19 Augusta?</p> <p>20 <b>A. Captain Whitt was their Adani</b></p> <p>21 <b>administrator.</b></p> <p>22 Q. Okay. And you said was. Is he no</p>	<p style="text-align: right;">3</p> <p>1 notes on the scan or in a file associated with the</p> <p>2 scan?</p> <p>3 <b>A. Yes, the machine does have that</b></p> <p>4 <b>capability.</b></p> <p>5 Q. Okay. To your knowledge is that</p> <p>6 capability utilized at Augusta in July 2019?</p> <p>7 <b>A. I have no knowledge.</b></p> <p>8 Q. Okay. Do you know of any facilities</p> <p>9 that use that capability?</p> <p>10 <b>A. No, I have no knowledge of that.</b></p> <p>11 Q. Are the -- the historical records are</p> <p>12 they searchable by individual?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. And so if I did a search of an</p> <p>15 individual, you know, what -- how would that be</p> <p>16 presented to me? What would pull up there? Just</p> <p>17 a listing of all their scans that I could click on</p> <p>18 or kind of thumbnails of all the images? What --</p> <p>19 what pulls up?</p> <p>20 <b>A. Initially an archive folder showing a</b></p> <p>21 <b>listing of all scans conducted on that individual</b></p> <p>22 <b>and then you would have to actually select the</b></p>
<p style="text-align: right;">30</p> <p>1 longer there?</p> <p>2 <b>A. I'm not sure if he's still there or</b></p> <p>3 <b>not.</b></p> <p>4 Q. Okay. Do you know if he's still the</p> <p>5 Adani administrator?</p> <p>6 <b>A. Yes and Sergeant Lokey has also since</b></p> <p>7 <b>been trained.</b></p> <p>8 Q. Okay. All right. Again, under the</p> <p>9 category I think I know but I will ask. Does --</p> <p>10 has it been your experience does the department</p> <p>11 back up the body scan images, you know, externally</p> <p>12 from the machine? Meaning, you know, every month</p> <p>13 we plug in a thumb drive and create a backup.</p> <p>14 <b>A. No.</b></p> <p>15 Q. Okay. Why not?</p> <p>16 <b>A. Good question.</b></p> <p>17 MR. REGNER: Objection to the</p> <p>18 extent it calls for speculation.</p> <p>19 You can answer if you know.</p> <p>20 <b>A. I don't know.</b></p> <p>21 Q. Okay. In the actual Adani machines</p> <p>22 when a scan comes up are you able to make any</p>	<p style="text-align: right;">32</p> <p>1 <b>scan that you're interested in actually pulling up</b></p> <p>2 <b>and then the image will acquire on the screen.</b></p> <p>3 Q. Okay. And how are those searchable?</p> <p>4 Are they searchable by name or employee ID or is</p> <p>5 there an altogether unique ID for the Adani</p> <p>6 machines?</p> <p>7 <b>A. By both. You can pull it up by name or</b></p> <p>8 <b>employee ID number --</b></p> <p>9 Q. Okay.</p> <p>10 <b>A. -- or whichever -- whatever the</b></p> <p>11 <b>identification number that was put into the system</b></p> <p>12 <b>for the individual.</b></p> <p>13 Q. So it could be a unique Adani number?</p> <p>14 <b>A. No, no. When I say whichever</b></p> <p>15 <b>identification because for visitors we don't use</b></p> <p>16 <b>EIN numbers so they use driver's license.</b></p> <p>17 Q. Gotcha. Okay. All right. Just</p> <p>18 circling back to the repair in Augusta. Do you</p> <p>19 recall what repair was needed?</p> <p>20 <b>A. I do not.</b></p> <p>21 Q. Have you ever been qualified in a court</p> <p>22 as an expert on reading body scan images?</p>

Transcript of Yulonda Wyche

9 (33 to 36)

Conducted on April 23, 2021

<p>33</p> <p>1 <b>A. No, not in court.</b></p> <p>2 Q. Okay. When you say no, not in court</p> <p>3 have you otherwise been qualified as an expert in</p> <p>4 reading body scan images?</p> <p>5 <b>A. I've testified --</b></p> <p>6 MR. REGNERY: Note -- note an</p> <p>7 objection. It calls for a legal opinion.</p> <p>8 You can go ahead and answer.</p> <p>9 <b>A. No, I've just testified.</b></p> <p>10 Q. Okay. But as a fact witness rather</p> <p>11 than an expert?</p> <p>12 <b>A. As -- as an expert for the department,</b></p> <p>13 <b>yes.</b></p> <p>14 Q. Okay. As an expert for the department</p> <p>15 on what issue?</p> <p>16 <b>A. On body scanner.</b></p> <p>17 Q. Okay.</p> <p>18 <b>A. So I've testified in hearings.</b></p> <p>19 Q. In -- in --</p> <p>20 <b>A. Grievance hearings.</b></p> <p>21 Q. Grievance hearings. Okay. All right.</p> <p>22 About how many?</p>	<p>35</p> <p>1 Q. Okay. And what was your role in that</p> <p>2 situation?</p> <p>3 <b>A. Basically to explain the training piece</b></p> <p>4 <b>and to also identify the anomaly to the EEO</b></p> <p>5 <b>investigator.</b></p> <p>6 Q. Okay. Do you recall who that was?</p> <p>7 <b>A. I do not.</b></p> <p>8 Q. Okay. Do you recall what facility was</p> <p>9 involved?</p> <p>10 <b>A. Coffeewood Correctional Center.</b></p> <p>11 Q. All right. And do you recall the</p> <p>12 employee's allegation in that EEO case?</p> <p>13 <b>A. Not -- not specifically, no.</b></p> <p>14 Q. Okay. Was that employee terminated</p> <p>15 from employment because of an anomaly in a scan?</p> <p>16 MR. REGNERY: Note an objection --</p> <p>17 <b>A. I don't know.</b></p> <p>18 MR. REGNERY: -- to this testimony</p> <p>19 as relevancy and also to the extent that any</p> <p>20 of the information may be attorney/client</p> <p>21 privileged.</p> <p>22 Go ahead and answer.</p>
<p>34</p> <p>1 <b>A. Actual hearing I can recall one.</b></p> <p>2 Q. Okay. And so thinking of just that one</p> <p>3 I don't necessarily need to know the names, but</p> <p>4 what was the subject matter that you were</p> <p>5 testifying on?</p> <p>6 <b>A. The use of the body scanners and its</b></p> <p>7 <b>safety.</b></p> <p>8 Q. Okay. So in the -- the safety of the</p> <p>9 radiation?</p> <p>10 <b>A. Radiation safety, yes. And then</b></p> <p>11 <b>privacy of the images being shown.</b></p> <p>12 Q. Okay. Did that grievance hearing</p> <p>13 involve contraband at all?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Okay. Have you -- any of your other</p> <p>16 experiences with grievances that may have not</p> <p>17 resulted in testimony did any of those involve</p> <p>18 contraband?</p> <p>19 <b>A. Contraband, no. But anomalies, yes.</b></p> <p>20 Q. Okay. Tell me the difference.</p> <p>21 <b>A. There was another one, sorry, it was a</b></p> <p>22 <b>federal EEO where an anomaly was present.</b></p>	<p>36</p> <p>1 Q. I mean, relevancy?</p> <p>2 <b>A. I don't know the outcome though of her</b></p> <p>3 <b>employment.</b></p> <p>4 Q. Okay. No, I'm not asking for the</p> <p>5 outcome. I'm asking for the allegation.</p> <p>6 <b>A. I don't know the specific allegation.</b></p> <p>7 <b>I don't recall it.</b></p> <p>8 Q. Okay. What was the general allegation?</p> <p>9 MR. REGNERY: Objection asked and</p> <p>10 answered.</p> <p>11 You can answer if you know.</p> <p>12 <b>A. I don't remember the specific</b></p> <p>13 <b>allegation, what the allegation actually was and I</b></p> <p>14 <b>don't want to miss -- misquote it.</b></p> <p>15 Q. Okay. Do you recall the employee's</p> <p>16 name?</p> <p>17 <b>A. I do not.</b></p> <p>18 Q. Okay. Do you recall which EEO office</p> <p>19 it was? Was it Richmond or Norfolk or Alexandria?</p> <p>20 <b>A. I just remember it was a federal EEO</b></p> <p>21 <b>case.</b></p> <p>22 Q. Okay. What was your interaction with</p>

Transcript of Yulonda Wyche

10 (37 to 40)

Conducted on April 23, 2021

<p>37</p> <p>1 the investigator? Did you have a phone call or an</p> <p>2 e-mail or how did you --</p> <p>3 <b>A. No, I was present during the interview.</b></p> <p>4 Q. Okay. An in-person interview?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Where did you go?</p> <p>7 <b>A. Coffeewood Correctional Center.</b></p> <p>8 Q. It was at Coffeewood. Okay. Where is</p> <p>9 Coffeewood?</p> <p>10 <b>A. I honestly can't remember the city. I</b></p> <p>11 <b>apologize.</b></p> <p>12 Q. What part of the state? I just don't</p> <p>13 know it.</p> <p>14 <b>A. It's in the central region.</b></p> <p>15 Q. Okay. All right. And so tell me what</p> <p>16 specifically were you there to tell the</p> <p>17 investigator?</p> <p>18 <b>A. I was there to again explain the</b></p> <p>19 <b>training, provide the training and to explain the</b></p> <p>20 <b>specifics of the anomaly on the image being shown.</b></p> <p>21 Q. Okay. Was the anomaly -- strike that.</p> <p>22 Was the employee a man or a woman?</p>	<p>39</p> <p>1 materials.</p> <p>2 (Document shared on screen.)</p> <p>3 Q. Can you see these?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Okay. And we looked at them briefly</p> <p>6 earlier and they are Exhibit One, but now that</p> <p>7 we'll talk about them some tell us again what they</p> <p>8 are. What are these materials?</p> <p>9 <b>A. Oh, I'm sorry. That's the</b></p> <p>10 <b>PowerPoint -- training PowerPoint --</b></p> <p>11 Q. Okay. That you --</p> <p>12 <b>A. -- that I used to train staff.</b></p> <p>13 Q. Okay. And that you helped prepare?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Once you -- I know Mr. Gregorio from</p> <p>16 Adani contributed some information. Once the</p> <p>17 materials were completed did you send them to him</p> <p>18 for review?</p> <p>19 <b>A. Yes, he has reviewed the PowerPoint.</b></p> <p>20 Q. Okay. Do you recall when that was?</p> <p>21 <b>A. I do not.</b></p> <p>22 Q. Okay. Do you recall if it was before</p>
<p>38</p> <p>1 <b>A. It was a female.</b></p> <p>2 Q. Okay. Was the anomaly in her vaginal</p> <p>3 area?</p> <p>4 <b>A. Yes, lower body cavity, yes.</b></p> <p>5 Q. Okay. And did you provide an opinion</p> <p>6 to the investigator as to what the anomaly was?</p> <p>7 <b>A. No.</b></p> <p>8 Q. Okay. Did you have an opinion as to</p> <p>9 what the anomaly was?</p> <p>10 <b>A. No.</b></p> <p>11 MR. REGNERY: Note a continued</p> <p>12 objection to the testimony.</p> <p>13 You can answer if you know.</p> <p>14 Q. Was the anomaly a tampon?</p> <p>15 <b>A. It did not appear to have the</b></p> <p>16 <b>characteristics of a tampon, no.</b></p> <p>17 Q. Okay. Was the employee terminated from</p> <p>18 employment?</p> <p>19 <b>A. I don't --</b></p> <p>20 MR. REGNERY: Objection.</p> <p>21 <b>A. -- know her employment status.</b></p> <p>22 Q. Okay. Okay. Let's look at these</p>	<p>40</p> <p>1 or after July 2019?</p> <p>2 <b>A. I do not recall when he reviewed it.</b></p> <p>3 Q. I am going to show you page 47 here.</p> <p>4 So these are images of visitors and employees that</p> <p>5 tried to circumvent the search process.</p> <p>6 This first one 48 do you have a</p> <p>7 recollection of how you obtained this image?</p> <p>8 <b>A. I believe I -- I'm not sure where I</b></p> <p>9 <b>got -- I mean, it's from our machines and whether</b></p> <p>10 <b>it was one provided by Sergeant Kidd or not; I</b></p> <p>11 <b>believe that it was one provided by Sergeant Kidd.</b></p> <p>12 Q. Okay. And this at least to me appears</p> <p>13 to be what we're talking about it's a picture of a</p> <p>14 screen; is that right?</p> <p>15 <b>A. Correct.</b></p> <p>16 Q. Okay. And it could be that you do not,</p> <p>17 but do you have an understanding as to who took</p> <p>18 the picture of the screen?</p> <p>19 <b>A. No, I don't. I don't know who took the</b></p> <p>20 <b>picture. I cannot recall.</b></p> <p>21 Q. And do you have an understanding of on</p> <p>22 what device the picture of the screen was taken?</p>

Transcript of Yulonda Wyche

11 (41 to 44)

Conducted on April 23, 2021

<p>4</p> <p>1 <b>A. No.</b></p> <p>2 Q. All right. Let's look at page 42 here.</p> <p>3 This is understanding what you are looking for.</p> <p>4 And the third bullet point here says most</p> <p>5 contraband will be concealed in the A woman</p> <p>6 internal body cavity. Did you write this third</p> <p>7 bullet point?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Okay. Had that been your experience at</p> <p>10 the time when you wrote it that most contraband</p> <p>11 will be concealed in the woman internal body</p> <p>12 cavity?</p> <p>13 <b>A. Yes. This was a talking point placed</b></p> <p>14 <b>in here because based upon statistics and just</b></p> <p>15 <b>data that we had retrieved from visitors and</b></p> <p>16 <b>visitors who had been caught with contraband the</b></p> <p>17 <b>majority were women. And then the place of</b></p> <p>18 <b>contraband being recovered was majorly from the</b></p> <p>19 <b>internal body cavity. But I also point out that</b></p> <p>20 <b>it's not all. We just say most but not all.</b></p> <p>21 Q. And so the genesis of this was</p> <p>22 statistics specific to visitors?</p>	<p>43</p> <p>1 machine than an Adani image?</p> <p>2 <b>A. I do not know the equipment used that</b></p> <p>3 <b>took the picture --</b></p> <p>4 Q. Okay.</p> <p>5 <b>A. -- other than a body scanner was the</b></p> <p>6 <b>search that I used to get the picture.</b></p> <p>7 Q. Okay. Do you recall the website you</p> <p>8 got it from on the internet?</p> <p>9 <b>A. I do not.</b></p> <p>10 Q. Okay. And just so I'm clear here. The</p> <p>11 training that you're doing, the training that</p> <p>12 these materials for is for Adani body image</p> <p>13 scanning, right?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And this is not an Adani body scanned</p> <p>16 image?</p> <p>17 <b>A. Not that particular image, no.</b></p> <p>18 Q. Okay. Again, under -- under the</p> <p>19 category of I think I know the answers but I -- I</p> <p>20 will ask for the record so bear with me.</p> <p>21 The person in this image that we're</p> <p>22 looking at do you know what brand of tampon they</p>
<p>42</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. Okay. Did you have any statistics</p> <p>3 specific to staff or contractors?</p> <p>4 <b>A. No.</b></p> <p>5 Q. Okay. Had this been your experience</p> <p>6 for staff or contractors?</p> <p>7 <b>A. I have experience with contraband being</b></p> <p>8 <b>recovered of both male and female, but I have not</b></p> <p>9 <b>actually had the numbers to determine more female</b></p> <p>10 <b>than male or vice versa of staff specifically.</b></p> <p>11 Q. Okay. So let's look at slide 44 here.</p> <p>12 Did you prepare this slide?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Okay. What does this slide show?</p> <p>15 <b>A. This is a slide that just shows a</b></p> <p>16 <b>picture of a tampon inserted and how it would</b></p> <p>17 <b>possibly look on the image or on a body scan.</b></p> <p>18 Q. Okay. Where did you get this image?</p> <p>19 <b>A. That one was received off the internet.</b></p> <p>20 Q. Okay. Is this an Adani image?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Okay. Is this a different x-ray</p>	<p>44</p> <p>1 were using?</p> <p>2 <b>A. No, I do not know.</b></p> <p>3 Q. Okay. Do you know if they were</p> <p>4 menstruating at the time of this picture?</p> <p>5 <b>A. No, I do not.</b></p> <p>6 Q. Okay. Do you know if they were</p> <p>7 experiencing a heavy flow in their menstruation at</p> <p>8 the time of this picture?</p> <p>9 <b>A. No, I do not.</b></p> <p>10 Q. Okay. Do you know whether this is a</p> <p>11 super absorbent tampon or not?</p> <p>12 <b>A. No, I do not.</b></p> <p>13 Q. Okay. We can look through it or if you</p> <p>14 recall are there any images in these materials of</p> <p>15 a person using a tampon in the Adani body scanned</p> <p>16 image?</p> <p>17 <b>A. Yes, there is.</b></p> <p>18 Q. Okay. Do you know -- we can -- you</p> <p>19 know, it's 126 pages. We can flip through them.</p> <p>20 Do you have an idea where that might be?</p> <p>21 <b>A. It should be towards the end before we</b></p> <p>22 <b>get to images of things actually recovered.</b></p>

Transcript of Yulonda Wyche

12 (45 to 48)

Conducted on April 23, 2021

<p style="text-align: right;">45</p> <p>1 Q. Okay. So you're talking about the</p> <p>2 electric -- (audio distortion.)</p> <p>3 (Interruption.) (Court Reporter requests</p> <p>4 clarification for the record.)</p> <p>5 Q. The electric tape one?</p> <p>6 <b>A. No. No.</b></p> <p>7 Q. Someone had wrapped electric tape in</p> <p>8 a --</p> <p>9 <b>A. No, I'm speaking of an actual tampon</b></p> <p>10 <b>inserted.</b></p> <p>11 Q. Okay. All right. Let's see if we can</p> <p>12 find it. So in this section of images of visitors</p> <p>13 that tried to circumvent the process?</p> <p>14 <b>A. Yes, towards the end.</b></p> <p>15 Q. Okay. All right. I'm gonna flip.</p> <p>16 Obviously stop me if you see it. We're only about</p> <p>17 halfway through now.</p> <p>18 <b>A. There.</b></p> <p>19 Q. Okay. So is this the same as this one?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Okay. So -- well, let's go with this</p> <p>22 one. So this is marked page 347. Tell me what</p>	<p style="text-align: right;">47</p> <p>1 <b>A. And so it was then that I was shown the</b></p> <p>2 <b>images. And I can say yes, I do in this image see</b></p> <p>3 <b>a tampon but I also see an additional anomaly or</b></p> <p>4 <b>something that's -- I can't say tampon but that</b></p> <p>5 <b>has the characteristics of a tampon and then also</b></p> <p>6 <b>an anomaly behind it that does not have those</b></p> <p>7 <b>characteristics.</b></p> <p>8 Q. So I think I'm clear but just so I'm</p> <p>9 clear. Your read of this scan is there is both a</p> <p>10 tampon and something else in the body cavity?</p> <p>11 <b>A. No, I would say that I see two</b></p> <p>12 <b>anomalies. There is one that you may can</b></p> <p>13 <b>reasonably say have the characteristics of a</b></p> <p>14 <b>tampon and then there's one that does not have the</b></p> <p>15 <b>characteristics, but I cannot specifically state</b></p> <p>16 <b>what either item is. It's -- both of them are</b></p> <p>17 <b>anomalies.</b></p> <p>18 Q. Okay. Okay. And this incident at</p> <p>19 Sussex II were you involved in it at all at the</p> <p>20 time that it occurred?</p> <p>21 <b>A. No, I was not present.</b></p> <p>22 Q. Okay. Do you know the result of this</p>
<p style="text-align: right;">46</p> <p>1 your understanding of what this image shows.</p> <p>2 <b>A. The first one will be clearer for me</b></p> <p>3 <b>to --</b></p> <p>4 Q. Okay. Well, let's use that one.</p> <p>5 <b>A. Okay.</b></p> <p>6 Q. Yeah.</p> <p>7 <b>A. So in this image here in the lower --</b></p> <p>8 <b>lower body extremity you will see just a small</b></p> <p>9 <b>slender image vertically inserted at the bottom</b></p> <p>10 <b>and then behind it you'll see an oval with a knot</b></p> <p>11 <b>tie hanging towards the left.</b></p> <p>12 (Interruption.) (Court Reporter requests</p> <p>13 clarification for the record.)</p> <p>14 <b>A. Knot tie.</b></p> <p>15 Q. Okay. Do you have a recollection of</p> <p>16 where you received this image from?</p> <p>17 <b>A. Yes, this was on a visitor at Sussex</b></p> <p>18 <b>II. And the reason I remember is because she had</b></p> <p>19 <b>also made the complaint that she was wearing a</b></p> <p>20 <b>tampon and that's the anomaly that the operator</b></p> <p>21 <b>saw.</b></p> <p>22 Q. Okay.</p>	<p style="text-align: right;">48</p> <p>1 incident at Sussex II?</p> <p>2 <b>A. I do not.</b></p> <p>3 Q. Okay. How did you come into possession</p> <p>4 of this image?</p> <p>5 <b>A. I want to say an investigator sent me</b></p> <p>6 <b>the image to look at it.</b></p> <p>7 Q. Okay. And -- well, strike that.</p> <p>8 Did the investigator send it to you</p> <p>9 during an active investigation or after the fact?</p> <p>10 <b>A. I don't know the particulars.</b></p> <p>11 Q. When was it that they sent this to you?</p> <p>12 <b>A. I cannot think of the -- recall the</b></p> <p>13 <b>exact date to be honest.</b></p> <p>14 Q. Okay. When you do your training and</p> <p>15 are on this slide what are you telling folks?</p> <p>16 <b>A. I'm letting them know first do they</b></p> <p>17 <b>notice the anomaly because we ask them to identify</b></p> <p>18 <b>it; to go up to the screen and tell us what they</b></p> <p>19 <b>think or where they think the anomaly is.</b></p> <p>20 <b>And once that's done then we've also</b></p> <p>21 <b>pointed out that there were two anomalies, but the</b></p> <p>22 <b>one that we were more so concerned with was</b></p>

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Transcript of Yulonda Wyche

13 (49 to 52)

Conducted on April 23, 2021

<p style="text-align: right;">49</p> <p>1 actually the one behind the back with the knot</p> <p>2 tie.</p> <p>3 Because again, we remind them to think</p> <p>4 about how contraband that has been recovered how</p> <p>5 it's been packaged. It's either in balloons,</p> <p>6 they're in cellophane. Some of the consistent</p> <p>7 characteristics have been knot ties or strings or</p> <p>8 tape. So always think about the way things are --</p> <p>9 have been packaged when you're reviewing scans.</p> <p>10 Q. Okay. And so of course I'm -- you</p> <p>11 know, don't have your experience. But tell me</p> <p>12 again where the knot tie you're -- or what appears</p> <p>13 to be a knot tie that you are talking about is.</p> <p>14 A. So the image is facing me so it's on my</p> <p>15 left.</p> <p>16 Q. Yeah.</p> <p>17 A. Yes.</p> <p>18 Q. This here?</p> <p>19 A. It has a little slight overhang right</p> <p>20 there, yes.</p> <p>21 Q. Okay.</p> <p>22 A. And so you see it's a little bit tight</p>	<p style="text-align: right;">5</p> <p>1 was conducted?</p> <p>2 A. I do not.</p> <p>3 Q. And do you know if any other search of</p> <p>4 her person was conducted?</p> <p>5 A. I do not.</p> <p>6 Q. Do you know if she was questioned?</p> <p>7 A. I do not.</p> <p>8 Q. And do you know if any contraband was</p> <p>9 recovered from her?</p> <p>10 A. I do not.</p> <p>11 Q. Well, so and -- and so just so we're</p> <p>12 clear then. This could have been a perfectly</p> <p>13 normal scan? There could have been --</p> <p>14 MR. REGNERY: It's --</p> <p>15 Q. Strike the question. Strike the</p> <p>16 question.</p> <p>17 Just so we're clear here. There could</p> <p>18 have been no contraband in her body cavity?</p> <p>19 MR. REGNERY: Objection to the</p> <p>20 extent it calls for speculation. Also asked</p> <p>21 and answered as to the images.</p> <p>22 You can answer.</p>
<p style="text-align: right;">50</p> <p>1 and then it has that slight overhang?</p> <p>2 Q. Yeah.</p> <p>3 A. On the top of the oval, yes. So it has</p> <p>4 the appearance of a possible tie.</p> <p>5 Q. Okay. So, I mean, I clearly see this</p> <p>6 kind of horizontal object --</p> <p>7 A. Yes.</p> <p>8 Q. -- and what you're referring to as a</p> <p>9 knot tie.</p> <p>10 A. Yes.</p> <p>11 Q. The other object or other anomaly that</p> <p>12 you're referring to is that the vertical dark</p> <p>13 thing here?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Okay. And I may have asked you</p> <p>16 this so forgive me. But do you recall the end</p> <p>17 result of this scan?</p> <p>18 A. I do not. It was -- it was a visitor.</p> <p>19 That I recall. And I do recall that the visitor</p> <p>20 had inquired so I believe that she was temporarily</p> <p>21 suspended, but I do not know the outcome.</p> <p>22 Q. Okay. Do you know if a strip search</p>	<p style="text-align: right;">52</p> <p>1 A. There is an anomaly present meaning not</p> <p>2 a part of the normal human anatomy.</p> <p>3 Q. You can say that for sure?</p> <p>4 A. Clearly.</p> <p>5 Q. Okay. But you don't know for sure what</p> <p>6 the anomaly or anomalies are?</p> <p>7 A. Correct.</p> <p>8 MR. REGNERY: Same objection.</p> <p>9 You can answer.</p> <p>10 Q. Okay. So one or both could be a</p> <p>11 tampon?</p> <p>12 MR. REGNERY: Same objection.</p> <p>13 You can answer.</p> <p>14 A. No. One or both -- they are -- both</p> <p>15 are anomalies. One definitely does not have any</p> <p>16 characteristics similar to a tampon.</p> <p>17 Q. Right. But I understood your testimony</p> <p>18 to be you don't know what the anomalies were?</p> <p>19 A. Specifically we don't, correct.</p> <p>20 Q. Okay. All right. So this is helpful.</p> <p>21 This is just for the record page</p> <p>22 V-D-O-C 346. Let's look at 347. And just tell me</p>

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Transcript of Yulonda Wyche

14 (53 to 56)

Conducted on April 23, 2021

<p style="text-align: right;">53</p> <p>1 this is -- is this just the same image as we just  2 looked at just a different focus?  3 <b>A. It's the exact same image and as you</b>  4 <b>see we're outlining where the oval is and what</b>  5 <b>appears to look like some sort of tie -- knot tie.</b>  6 Q. Okay. And so in this image on 347  7 you've only circled in red one of the two  8 anomalies; is that correct?  9 <b>A. Yes, correct.</b>  10 Q. Okay.  11 MR. REGNER: I'm gonna note an  12 objection. That's not what I'm seeing on the  13 screen but I'll just note an objection --  14 Q. Okay.  15 MR. REGNER: -- to the extent it  16 mischaracterizes the image.  17 Q. Okay. That is helpful.  18 Are there to your knowledge any other  19 images of tampons by Adani scanners in this set of  20 slides?  21 <b>A. There are other images in the slides</b>  22 <b>that have similar characteristics meaning in the</b></p>	<p style="text-align: right;">55</p> <p>1 <b>A. Yes.</b>  2 Q. Okay. And so my -- well, what this  3 says here it says strip search revealed the  4 alleged tampon was toilet paper wrapped in black  5 electric tape. So what was recovered was not  6 actually a tampon; is that right?  7 <b>A. Yes.</b>  8 MR. REGNER: Note an objection to  9 the characterization of what's written above,  10 but you can answer.  11 <b>A. Yes, the picture shows what was</b>  12 <b>actually recovered which was toilet paper wrapped</b>  13 <b>in electrical tape showing some of the</b>  14 <b>characteristics --</b>  15 Q. Okay.  16 <b>A. -- and what was alleged to be a tampon.</b>  17 Q. Okay. Were you personally involved in  18 this situation November 2018 at Greenville?  19 <b>A. No.</b>  20 Q. Okay. How did you get these images  21 here on this slide?  22 <b>A. From the investigator.</b></p>
<p style="text-align: right;">54</p> <p>1 <b>shape of, yes.</b>  2 Q. In the shape of tampons?  3 <b>A. In the shape of but again we can't</b>  4 <b>positively say that yes, that's what it is or no,</b>  5 <b>that's not what it is.</b>  6 Q. Okay. Well --  7 <b>A. In some instances where those that have</b>  8 <b>the shape of it came about that they actually know</b>  9 <b>it was not what it was.</b>  10 Q. Okay. And so that -- again, I may just  11 be wrong again, but is that the electric tape  12 situation?  13 <b>A. Yes, that's one of them, yes.</b>  14 Q. Okay. So let's look at that. I think  15 that's towards the end as well. Okay. So this is  16 the electric tape thing I'm thinking of. Is that  17 what you're thinking of?  18 <b>A. That's one. There's another.</b>  19 Q. Okay. So let's see. Let's first look  20 at this slide. Let's first look at this slide  21 that is V-D-O-C 353. And this appears to reflect  22 what was recovered; is that right?</p>	<p style="text-align: right;">56</p> <p>1 Q. Okay. Do you recall who that was?  2 <b>A. Sergeant Kidd.</b>  3 Q. Okay. And then is this next slide the  4 body scan image --  5 <b>A. Yes.</b>  6 Q. -- from the contraband we just looked  7 at?  8 <b>A. Yes.</b>  9 Q. Okay. Is this an Adani body scan  10 image?  11 <b>A. Yes.</b>  12 Q. Okay. And then again I guess I know  13 but I will ask. How did you obtain this body scan  14 image for -- to put in the slides?  15 <b>A. Sergeant Kidd provided it.</b>  16 Q. Okay. And so then let's zoom in here  17 and you tell me what you see.  18 <b>A. So you do see a similar in shape image</b>  19 <b>and it's sort of protruding at the bottom, yes, of</b>  20 <b>the pelvic area but it's very, very light which</b>  21 <b>kind of tells us based upon density sometimes</b>  22 <b>things show up darker or lighter on the screen.</b></p>

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Transcript of Yulonda Wyche

15 (57 to 60)

Conducted on April 23, 2021

<p>57</p> <p>1 Q. And so what does the lightness here 2 tell you?</p> <p>3 <b>A. That the item is not as dense.</b></p> <p>4 Q. Not as dense as what?</p> <p>5 <b>A. As some things are. Some things are --</b> 6 <b>you know, material is some things are denser than</b> 7 <b>others but it doesn't -- that's all it says.</b> 8 <b>Based on the density whether it's darker or</b> 9 <b>lighter there's different settings on the machine</b> 10 <b>that will bring things more to light or not.</b></p> <p>11 Q. Okay. And so if you know or from your 12 training having seen this scan, this image what 13 would trigger follow-up investigation?</p> <p>14 <b>A. It does not appear to be a normal part</b> 15 <b>of the human anatomy.</b></p> <p>16 Q. Okay. Is a tampon a normal part of the 17 human anatomy?</p> <p>18 <b>A. It is not.</b></p> <p>19 Q. Is a tampon an anomaly?</p> <p>20 <b>A. It could be considered such.</b></p> <p>21 Q. Okay. Does every anomaly require an 22 investigation?</p>	<p>59</p> <p>1 Q. Okay. Is a tampon an anomaly?</p> <p>2 MR. REGNERY: Objection asked and 3 answered and also to the extent it calls for 4 speculation.</p> <p>5 You can -- you can answer.</p> <p>6 <b>A. Specifically if you know that it's a</b> 7 <b>tampon, no, it's not an anomaly. An anomaly is</b> 8 <b>something -- an unknown object. So if I know that</b> 9 <b>it's a tampon then, no, it's not an anomaly.</b></p> <p>10 Q. Okay. How would you know whether or 11 not it's a tampon?</p> <p>12 <b>A. It will be hard to say without</b> 13 <b>certainty, but again things that have</b> 14 <b>characteristics of a tampon or don't have then you</b> 15 <b>can reasonably rule out that that is not one.</b></p> <p>16 Q. Okay. In these training materials is 17 there any baseline slide of here's what a 18 tampon -- just a normal tampon looks like on an 19 Adani scan?</p> <p>20 <b>A. No, this image that you showed earlier</b> 21 <b>is a baseline saying here's what a tampon looks</b> 22 <b>like on body scanner.</b></p>
<p>58</p> <p>1 <b>A. To question, yes. To ask questions,</b> 2 <b>yes.</b></p> <p>3 Q. So I'm just trying, you know, to 4 understand and I'm gonna ask an inartful question 5 that Ron will object to. But are you saying that 6 every time a body scan CO sees a tampon they 7 should investigate?</p> <p>8 <b>A. No.</b></p> <p>9 MR. REGNERY: Note an objection. 10 Calls for speculation, but you can answer.</p> <p>11 <b>A. No, that's not what I'm saying.</b></p> <p>12 Q. Okay. So I'm just trying to kind of 13 work through it sequentially that a tampon is an 14 anomaly. How do you know -- how do you know when 15 to do a follow-up investigation or not?</p> <p>16 <b>A. If -- if an anomaly is present that</b> 17 <b>would reasonably cause you to believe that it is</b> 18 <b>an anomaly then you should definitely ask</b> 19 <b>questions.</b></p> <p>20 Q. Okay.</p> <p>21 <b>A. And there are other steps according to</b> 22 <b>policy that you must take.</b></p>	<p>60</p> <p>1 Q. But you don't know for sure that that's 2 a body scanner in that image we looked at?</p> <p>3 MR. REGNERY: Objection asked and 4 answered.</p> <p>5 You can answer.</p> <p>6 Q. The question again is you don't know 7 for sure that that's a body scanner in that first 8 image we looked at?</p> <p>9 <b>A. I know that the image was identified as</b> 10 <b>a body scanner image.</b></p> <p>11 Q. On Google?</p> <p>12 <b>A. Yes.</b></p> <p>13 MR. REGNERY: Objection asked and 14 answered.</p> <p>15 You can respond.</p> <p>16 MR. FALABELLA: Okay. Okay. Okay. 17 Let's take a break here. I don't have a 18 whole lot more but probably a bit more. So 19 let's take a ten minute break if that works 20 for everyone and come back at 2:29.</p> <p>21 MR. REGNERY: Okay. That works. 22 (Recess.)</p>

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Transcript of Yulonda Wyche

16 (61 to 64)

Conducted on April 23, 2021

<p>6</p> <p>1 BY MR. FALABELLA:</p> <p>2 Q. All right. We are back on the record.</p> <p>3 I'm going to bring Exhibit One back up</p> <p>4 here.</p> <p>5 (Document shared on screen.)</p> <p>6 Q. And we were talking about other slides</p> <p>7 in your materials that reflected tampon like</p> <p>8 anomalies from Adani scans and we've looked at two</p> <p>9 different examples. Are there any others in the</p> <p>10 material?</p> <p>11 <b>A. Not that I can -- yes, there's another.</b></p> <p>12 Q. Okay. Let's see if we can find it. Do</p> <p>13 you know if it's towards the end?</p> <p>14 <b>A. It would be in -- it's still in this</b></p> <p>15 <b>section so just continue on.</b></p> <p>16 Q. Let me scan out a little bit.</p> <p>17 <b>A. That one.</b></p> <p>18 Q. This one?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Okay. Does this one have an</p> <p>21 accompanying body scan image?</p> <p>22 <b>A. It does not.</b></p>	<p>63</p> <p>1 scan associated with this incident; is that right?</p> <p>2 <b>A. Correct.</b></p> <p>3 Q. Okay. All right. Any other -- I'm</p> <p>4 looking for again specific Adani scans of tampons</p> <p>5 or Adani scans of anomalies with tampon like</p> <p>6 characteristics.</p> <p>7 <b>A. That is all.</b></p> <p>8 Q. Okay. All right. The cell phone one</p> <p>9 is my favorite by far.</p> <p>10 Okay. All right. You had briefly</p> <p>11 mentioned when we were looking at these scans the</p> <p>12 protocol when an anomaly is detected. Tell me</p> <p>13 what that protocol is.</p> <p>14 <b>A. So an anomaly is detected. Staff is</b></p> <p>15 <b>then to contact a supervisor or a higher</b></p> <p>16 <b>experienced operator for confirmation or to confer</b></p> <p>17 <b>with that the anomaly is agreed upon. The</b></p> <p>18 <b>individual is to then have a seat and remain under</b></p> <p>19 <b>constant supervision and permission is then given</b></p> <p>20 <b>to have the individual ran on a higher setting and</b></p> <p>21 <b>preferably a dual setting so that you can get yet</b></p> <p>22 <b>a clear or a different angle of the -- of the</b></p>
<p>62</p> <p>1 Q. Okay. So I guess tell me what's</p> <p>2 described here.</p> <p>3 <b>A. So here again you see an item that was</b></p> <p>4 <b>recovered that is cylinder in shape, has some of</b></p> <p>5 <b>the characteristics but not all, smaller in size</b></p> <p>6 <b>but inside of it was 676 Suboxone strips along</b></p> <p>7 <b>with heroin that was recovered at Augusta</b></p> <p>8 <b>Correctional Center and was actually one of our</b></p> <p>9 <b>largest drug busts in visitation for our history.</b></p> <p>10 Q. And for the record we are on V-D-O-C</p> <p>11 360. When did this happen at Augusta?</p> <p>12 <b>A. Was in March of 2019.</b></p> <p>13 Q. Okay. Were you directly involved in</p> <p>14 this situation?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Okay. And this appears to be, but</p> <p>17 correct me if I'm wrong, is this a snippet from</p> <p>18 Virginia Department of Corrections Facebook or --</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. -- social media page?</p> <p>21 <b>A. Our social media page, yes.</b></p> <p>22 Q. Okay. And you do -- we do not have the</p>	<p>64</p> <p>1 <b>picture -- or the image -- or the anomaly. They</b></p> <p>2 <b>also are advised to do comparison photos of</b></p> <p>3 <b>previous scans.</b></p> <p>4 Q. Okay. Previous scans of that person?</p> <p>5 <b>A. Correct.</b></p> <p>6 Q. Okay. Would this protocol apply to</p> <p>7 staff or contractors as well?</p> <p>8 <b>A. Yes, to all individuals ran through the</b></p> <p>9 <b>scanner.</b></p> <p>10 Q. All right. And then you gave me two</p> <p>11 somewhat technical terms here. Ran at a dual</p> <p>12 setting. What is that?</p> <p>13 <b>A. It's a higher setting, gives you upper</b></p> <p>14 <b>close picture of the lower cavity.</b></p> <p>15 Q. Okay. And then this could be</p> <p>16 self-explanatory but you also said ran at a higher</p> <p>17 setting. What's a higher setting?</p> <p>18 <b>A. It's a higher setting. They start at</b></p> <p>19 <b>low. All individuals are ran at low and going to</b></p> <p>20 <b>dual is a higher setting than low.</b></p> <p>21 Q. Just low what?</p> <p>22 <b>A. Low dosage. Low, medium, high</b></p>

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Transcript of Yulonda Wyche

17 (65 to 68)

Conducted on April 23, 2021

<p style="text-align: right;">65</p> <p>1 <b>settings.</b></p> <p>2 Q. And low dosage of radiation?</p> <p>3 <b>A. It's the lowest dosage, yes.</b></p> <p>4 Q. Okay. And what does -- what affect</p> <p>5 does increasing the dosage of radiation have on</p> <p>6 the images generated?</p> <p>7 <b>A. The only affect it could possibly have</b></p> <p>8 <b>is the penetration for density.</b></p> <p>9 Q. Okay. We've seen some scans in the</p> <p>10 material that we -- we just looked at where the</p> <p>11 image is gray scale or black and white and then</p> <p>12 we've seen some images with some coloration. Are</p> <p>13 those coloration images reflective of increased --</p> <p>14 reflective of a dual setting?</p> <p>15 <b>A. No, the colorations is just another</b></p> <p>16 <b>view.</b></p> <p>17 Q. Okay. So those are not necessarily a</p> <p>18 scan taken with a higher dosage?</p> <p>19 <b>A. No.</b></p> <p>20 Q. Okay. All right. So once those steps</p> <p>21 have been taken, contact the supervisor,</p> <p>22 confirmation, you know, set the individual aside</p>	<p style="text-align: right;">67</p> <p>1 said at the outset is -- is who I represent in</p> <p>2 this matter.</p> <p>3 When did you first become aware of</p> <p>4 Joyce Flores?</p> <p>5 <b>A. By name I can't recall the exact date,</b></p> <p>6 <b>but by way of complaint being made.</b></p> <p>7 Q. Okay. A complaint being made where?</p> <p>8 <b>A. For her body image with the scan.</b></p> <p>9 Q. Okay. But I'm asking -- well, a</p> <p>10 complaint made to whom?</p> <p>11 <b>A. To the department.</b></p> <p>12 Q. Okay. By Joyce Flores?</p> <p>13 <b>A. To my knowledge that's when I first</b></p> <p>14 <b>heard of her name, yes.</b></p> <p>15 Q. Okay. And again, we just may be mixing</p> <p>16 things up here, but are you saying -- when you say</p> <p>17 complaint do you mean a lawsuit or do you mean a</p> <p>18 call to the warden?</p> <p>19 <b>A. A concern and not -- not -- I don't</b></p> <p>20 <b>have the particulars. I just recall seeing her</b></p> <p>21 <b>name being mentioned in review of asking me about</b></p> <p>22 <b>the scans because of a concern that she expressed.</b></p>
<p style="text-align: right;">66</p> <p>1 and run at a higher setting if possible what</p> <p>2 happens next in the protocol?</p> <p>3 <b>A. If there is a K9 present they would</b></p> <p>4 <b>utilize them to search the person and/or the</b></p> <p>5 <b>vehicle. But what happens next is also consulted</b></p> <p>6 <b>upon with the facility unit head.</b></p> <p>7 Q. And is that the warden?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Okay. All right. Okay. Is that</p> <p>10 protocol written down anywhere?</p> <p>11 <b>A. Within our policy, yes.</b></p> <p>12 Q. Do you know what policy it is?</p> <p>13 <b>A. It's in our search policy.</b></p> <p>14 Q. Okay. In a search -- a standard</p> <p>15 operating procedure?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Okay. Do you recall what number it is?</p> <p>18 <b>A. It's in my presentation.</b></p> <p>19 Q. Okay. Would it be --</p> <p>20 <b>A. 445.1.</b></p> <p>21 Q. Got it. Okay. Okay. All right.</p> <p>22 Let's talk about Joyce Flores for a bit who as I</p>	<p style="text-align: right;">68</p> <p>1 <b>And I don't recall exactly but I believe it was</b></p> <p>2 <b>EEO here the department.</b></p> <p>3 Q. Okay. And was that the HR manager that</p> <p>4 reached out to you?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Okay. All right. All right. You</p> <p>7 heard the warden testify earlier today about a</p> <p>8 conversation he had where he showed you some</p> <p>9 images. Do you remember that conversation with</p> <p>10 Warden Woodson?</p> <p>11 <b>A. I do.</b></p> <p>12 Q. Okay. Tell me what you remember of it.</p> <p>13 Where was it?</p> <p>14 <b>A. We were at a hearing in Staunton and I</b></p> <p>15 <b>recall him showing me his telephone -- images on</b></p> <p>16 <b>his phone.</b></p> <p>17 Q. Okay. Do you remember how many images</p> <p>18 he showed you?</p> <p>19 <b>A. Two.</b></p> <p>20 Q. Two.</p> <p>21 Okay. And did both of the images --</p> <p>22 strike that.</p>

Transcript of Yulonda Wyche

18 (69 to 72)

Conducted on April 23, 2021

<p>69</p> <p>1 Did -- what did the images appear to be</p> <p>2 to you?</p> <p>3 <b>A. An anomaly of some sort in the lower</b></p> <p>4 <b>body cavity.</b></p> <p>5 Q. In both images?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Okay. What did the warden tell you</p> <p>8 when he was showing you these images?</p> <p>9 <b>A. I honestly don't recall the</b></p> <p>10 <b>conversation verbatim.</b></p> <p>11 Q. Okay.</p> <p>12 <b>A. I just recall him asking me to look at</b></p> <p>13 <b>them and what did I think about it.</b></p> <p>14 Q. Okay. And what did you tell him?</p> <p>15 <b>A. That I do believe that there's an</b></p> <p>16 <b>anomaly present and that it had characteristics of</b></p> <p>17 <b>those based on my training it signified some type</b></p> <p>18 <b>of contraband. It appeared it was oval in shape,</b></p> <p>19 <b>there appeared to be a knot tie and then there was</b></p> <p>20 <b>a string on it going upward.</b></p> <p>21 Q. Okay.</p> <p>22 <b>A. And the position of it in the lower</b></p>	<p>7</p> <p>1 <b>A. On his cell phone.</b></p> <p>2 Q. Okay. Did he tell you that the person</p> <p>3 in the images was let -- was allowed to proceed to</p> <p>4 her workstation and work for two hours after the</p> <p>5 image was taken?</p> <p>6 <b>A. No.</b></p> <p>7 Q. Okay. Would that be consistent with</p> <p>8 protocol?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Okay. Did you provide any</p> <p>11 recommendation to Warden Woodson when you saw the</p> <p>12 images?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Okay. After you saw the images did you</p> <p>15 in turn consult with anyone regarding the images?</p> <p>16 <b>A. No.</b></p> <p>17 Q. After you saw the images on his phone</p> <p>18 did he subsequently send them to you in any other</p> <p>19 form?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Okay. Did he tell you that it was a</p> <p>22 staff member and not a visitor?</p>
<p>70</p> <p>1 <b>body cavity --</b></p> <p>2 Q. Okay.</p> <p>3 <b>A. -- it was inserted.</b></p> <p>4 Q. All right. And what did he say to</p> <p>5 that?</p> <p>6 <b>A. I don't recall what his comment was</b></p> <p>7 <b>afterwards.</b></p> <p>8 Q. Okay.</p> <p>9 <b>A. I believe he said okay.</b></p> <p>10 Q. All right. Did he tell you any of the</p> <p>11 circumstances of the situation?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Okay. It was just here's an image,</p> <p>14 what's your opinion?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Okay. How did he show you --</p> <p>17 MR. REGNERY: I'm sorry, Paul. I</p> <p>18 was on mute. I'm just gonna object to asked</p> <p>19 and answered and to the characterization of</p> <p>20 the response, but she can answer. I'm sorry</p> <p>21 my mute was on.</p> <p>22 Q. And how did he show you the images?</p>	<p>72</p> <p>1 <b>A. I don't recall that he did or didn't.</b></p> <p>2 Q. Okay. Did he tell you if he was trying</p> <p>3 to make a decision or not?</p> <p>4 <b>A. Not that I recall, no.</b></p> <p>5 Q. I guess why was he showing them to you</p> <p>6 then?</p> <p>7 <b>A. For my --</b></p> <p>8 MR. REGNERY: Objection to the</p> <p>9 extent it calls for speculation.</p> <p>10 You can answer.</p> <p>11 <b>A. He just showed me the images and asked</b></p> <p>12 <b>me what did I think about them.</b></p> <p>13 Q. Okay. You probably heard him testify</p> <p>14 that he showed Mr. Robinson as well. Were you</p> <p>15 present when he showed Mr. Robinson the images?</p> <p>16 <b>A. I cannot remember exactly.</b></p> <p>17 Q. Okay. Was Mr. Robinson to your</p> <p>18 recollection at that same meeting in Staunton?</p> <p>19 <b>A. Yes, he was.</b></p> <p>20 MR. FALABELLA: Okay. I do not</p> <p>21 have any further questions for you but</p> <p>22 Mr. Regnery may or may not.</p>



Transcript of Yulonda Wyche

19 (73 to 76)

Conducted on April 23, 2021

<p>73</p> <p>1 MR. REGNERY: Paul, I know we just 2 took a break. Why don't we take about a ten 3 to 15 minute break and look over my notes and 4 then we'll go back on maybe at 3:00. 5 MR. FALABELLA: Whatever you need, 6 Ron. 7 MR. REGNERY: Okay. Thanks. 8 (Recess.) 9 EXAMINATION 10 BY MR. REGNERY: 11 Q. All right. Ms. Wyche, I have a couple 12 of follow-up questions. I want to make sure I'm 13 not on mute again. 14 It's not your testimony here today that 15 every tampon that -- that comes up on one of the 16 body scanners is an anomaly; is that correct? 17 <b>A. Yes.</b> 18 MR. FALABELLA: Objection to form. 19 Q. And not every female that goes through 20 a scanner wearing a tampon is stopped or 21 questioned or searched. Is that your 22 understanding?</p>	<p>75</p> <p>1 things of that nature that are characteristics 2 typically of contraband? 3 <b>A. Yes, correct.</b> 4 Q. And -- and they're trained on that so 5 then they -- when they see that they then are to 6 take next steps, whatever they may be, to further 7 investigate the issue; is that correct? 8 <b>A. Yes.</b> 9 MR. REGNERY: I have nothing 10 further. 11 FURTHER EXAMINATION 12 BY MR. FALABELLA: 13 Q. The first step should be stopping the 14 individual with the anomaly at the scan location; 15 is that right? 16 <b>A. Yes.</b> 17 MR. FALABELLA: No further 18 questions. 19 MR. REGNERY: I think we're good. 20 I'm just double-checking. I don't think that 21 triggers anything. I think that's good. I 22 have nothing further.</p>
<p>74</p> <p>1 <b>A. Correct. No, not every female.</b> 2 Q. Okay. But based on your experience and 3 the information that's provided to you females 4 will often use the vaginal area to try to smuggle 5 in contraband in a facility; is that correct? 6 MR. FALABELLA: Objection to form. 7 <b>A. Yes, that's correct.</b> 8 Q. And in fact it's not uncommon for them 9 to do so, correct? 10 MR. FALABELLA: Objection to form. 11 <b>A. Correct.</b> 12 Q. And the training that you provide that 13 we've talked about and has been discussed here, I 14 think it was Exhibit One, the goal or the aim of 15 that is to provide guidance to correctional 16 employees on what to look for that could be 17 characteristics of contraband, correct? 18 <b>A. Yes, that's correct.</b> 19 Q. And -- and I think you gave some 20 examples of that and -- and that being how an item 21 is packaged, for example, how it may appear to 22 have a tie on it or it may be a certain shape or</p>	<p>76</p> <p>1 If -- if we could if you can just 2 explain to the witness between reading and 3 waiving. 4 (Discussion off the record regarding 5 reading/waiving.) 6 (Whereupon, at 3:13 p.m., the taking of 7 the instant remote videoconference deposition ceased.) 8 (Whereupon, the reading and signing by the 9 witness to the remote videoconference deposition is 10 hereby reserved.) 11 12 13 14 15 16 17 18 19 20 21 22</p>

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Transcript of Yulonda Wyche  
Conducted on April 23, 2021

20 (77 to 80)

77

CERTIFICATE OF REPORTER

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COUNTY OF WAKE )

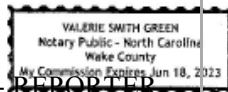
I, VALERIE SMITH GREEN, the reporter by  
whom the foregoing deposition was taken, do hereby  
certify that the witness whose testimony appears in  
the foregoing deposition was duly identified and  
testified under penalties of perjury; that the  
testimony of said witness was taken by me to the  
best of my ability and thereafter reduced to  
typewriting under my direction; that I am neither  
counsel for, related to, nor employed by any of the  
parties to the action in which this deposition was  
taken, and further that I am not a relative or  
employee of any attorney or counsel employed by the  
parties thereto, nor financially or otherwise  
interested in the outcome of the action.

This, the 6th day of May, 2021.

*Valerie Smith Green*

VALERIE SMITH GREEN - ~~REPORTER~~

Notary Public #19981560010



## Transcript of Yulonda Wyche

Conducted on April 23, 2021

21

A			
a&m	34: , 45:9	48:9, 7 :4,	30:8, 3 : 7,
7: 5	actually	7 : 4, 7 : 7	3 : 8, 3 :2 ,
ability	:2, 3:7,	afternoon	32: 7, 33:2 ,
77: 2	7:7, 2 : 0,	5:2, 6:4	34: 3, 35: ,
able	2 : 8, 3 :22,	afterwards	37: 5, 4 :2,
9:20, 4:22,	32: , 36: 3,	28:2 , 70:7	4 :20, 45: ,
9: , 27: 9,	42:9, 44:22,	again	45: 5, 47: 9,
30:22	49: , 54:8,	5: 4, 6: 4,	52:20, 57:7,
about	55:6, 55: 2,	9: 6, 0: 0,	6 :2, 62:5,
7:4, 24:2 ,	62:8	5:2 , 8:3,	63:3, 63:7,
28:2 , 33:22,	adams	2 : 8, 30:8,	63:8, 63: 0,
39:7, 40: 3,	7: 2	37: 8, 39:7,	64:8, 64: 0,
45: , 45: 6,	adani	43: 8, 49:3,	64: 9, 65:20,
49:4, 49:8,	3:8, 9: 4,	49: 2, 54:3,	66:9, 66:2 ,
49: 3, 54:8,	9: 6, 0: ,	54: 0, 54: ,	68:6, 70:4,
6 :6, 66:22,	0: 0, 0: ,	56: 2, 59: 3,	70: 0, 73:
67:2 , 68:7,	0: 2, 2:2 ,	60:6, 62:3,	allegation
69: 3, 72: 2,	4: , 5:4,	63:4, 67: 5,	35: 2, 36:5,
73:2, 74: 3	6: 8, 6: 9,	73: 3	36:6, 36:8,
above	7: 9, 7:2 ,	against	36: 3
55:9	9:20, 20:8,	5:8	alleged
absorbent	20: 4, 2 : 4,	ago	55:4, 55: 6
44:	22:5, 23: 0,	24:2	alleging
aca	29: 6, 29: 8,	agree	5:8
9:6	29:20, 30:5,	4: 3	allowed
academy	30:2 , 32:5,	agreed	7 :3
	32: 3, 39: 6,	63: 7	along
accompanying	42:20, 43: ,	ahead	62:6
6 :2	43: 2, 43: 5,	33:8, 35:22	already
accordance	44: 5, 53: 9,	aim	5: 3, 6: 4,
2 :20, 22:	56:9, 59: 9,	74: 4	8:4
according	6 :8, 63:4, 63:5	alabama	also
8:6, 58:2	addition	7: 5, 8:5	2:25, 7: 6,
accurate	9: 3	alexandria	8:20, 9:9, 9: 5,
5: 6, 27:20	additional	36: 9	3: 4, 5: 2,
acknowledge	47:3	all	7:7, 9: ,
4:6, 4: 5	address	4: 3, 5:20,	22: 7, 25: 9,
acquire	6:22	6:3, 6: 3, 7: ,	30:6, 35:4,
32:2	administrator	0:9, 2:6,	35: 9, 4 : 9,
across	29:2 , 30:5	3:4, 3: 2,	46: 9, 47:3,
22:22	admissibility	5: 3, 6:4,	47:5, 48:20,
action	4:9	6:9, 6: 4,	5 :20, 59:3,
77: 5, 77: 9	advised	7:2 , 8:7,	64:2, 64: 6,
active	64:2	8: 6, 9: 9,	66:5
48:9	affect	20: 8, 2 : 3,	altogether
actual	65:4, 65:7	22:5, 22: 0,	32:5
7:6, 30:2 ,	after	22:22, 23:9,	always
	2:20, 40: ,	24:20, 29:7,	49:8

Transcript of Yulonda Wyche  
Conducted on April 23, 2021

22

<b>american</b> 9:7 <b>amount</b> 9:2 <b>amounts</b> 6: 3 <b>anatomy</b> 52:2, 57: 5, 57: 7 <b>angle</b> 63:22 <b>annually</b> 5: 3, 5: 4 <b>anomalies</b> 34: 9, 47: 2, 47: 7, 48:2 , 52:6, 52: 5, 52: 8, 53:8, 6 :8, 63:5 <b>anomaly</b> 34:22, 35:4, 35: 5, 37:20, 37:2 , 38:2, 38:6, 38:9, 38: 4, 46:20, 47:3, 47:6, 48: 7, 48: 9, 50: , 52: , 52:6, 57: 9, 57:2 , 58: 4, 58: 6, 58: 8, 59: , 59:7, 59:9, 63: 2, 63: 4, 63: 7, 64: , 69:3, 69: 6, 73: 6, 75: 4 <b>another</b> 23: 2, 34:2 , 54: 8, 6 : , 65: 5 <b>answer</b> 5:2 , 6: 8, : 3, 25:6, 27:6, 27:8, 29: 3, 30: 9, 33:8, 35:22, 36: , 38: 3,	5 :22, 52:9, 52: 3, 55: 0, 58: 0, 59:5, 60:5, 70:20, 72: 0 <b>answered</b> : 2, 36: 0, 5 :2 , 59:3, 60:4, 60: 4, 70: 9 <b>answering</b> 22:3 <b>answers</b> 5: 5, 43: 9 <b>any</b> 6:5, 8:7, 8: 2, 4: 2, 9: 4, 9: 9, 22:3, 22:6, 23: 6, 25:2, 25: , 28:9, 28: 4, 30:22, 3 :8, 34: 5, 34: 7, 35: 9, 42:2, 44: 4, 5 :3, 5 :8, 52: 5, 53: 8, 59: 7, 6 :9, 63:3, 70: 0, 7 : 0, 7 : 8, 72:2 , 77: 4, 77: 7 <b>anybody</b> 8: 8 <b>anyone</b> 7 : 5 <b>anything</b> 23: 3, 75:2 <b>anywhere</b> 66: 0 <b>apologize</b> 37: <b>appear</b> 38: 5, 57: 4, 69: , 74:2 <b>appearance</b> 2: , 50:4 <b>appeared</b> 69: 8, 69: 9	<b>appearing</b> 2:4, 2: 4 <b>appears</b> 40: 2, 49: 2, 53:5, 54:2 , 62: 6, 77:8 <b>applicants</b> 20: 8 <b>applications</b> 2 : <b>apply</b> 20: 9, 64:6 <b>approximately</b> 8: <b>april</b> :24 <b>archive</b> 3 :20 <b>area</b> 38:3, 56:20, 74:4 <b>around</b> 8:9, 2 :2 , 29:5 <b>aside</b> 65:22 <b>asked</b> : 2, 36:9, 50: 5, 5 :20, 59:2, 60:3, 60: 3, 70: 8, 72: <b>asking</b> 36:4, 36:5, 67:9, 67:2 , 69: 2 <b>assessments</b> 20:6 <b>assisted</b> 5: 2 <b>associated</b> 3 : , 63: <b>association</b> 9:7 <b>attention</b> 22: 7 <b>attorney</b> 2: 8, 35:20,	77: 7 <b>audio</b> 45:2 <b>audit</b> 20:6 <b>augusta</b> 28: 5, 28: 9, 29: 9, 3 :6, 32: 8, 62:7, 62: <b>aware</b> 28: 4, 67:3 <hr/> <b>B</b> <hr/> <b>back</b> 9:22, 9:22, 22: 8, 27:22, 29: , 30: , 32: 8, 49: , 60:20, 6 :2, 6 :3, 73:4 <b>background</b> 20:22 <b>backup</b> 30: 3 <b>backwater</b> 7: <b>balloons</b> 49:5 <b>based</b> 4: 0, 4:7, 9: , 9: 7, 28:3, 4 : 4, 56:2 , 57:8, 69: 7, 74:2 <b>baseline</b> 59: 7, 59:2 <b>basic</b> 8: 8 <b>basically</b> 35:3 <b>bear</b> 43:20 <b>became</b> 9: 3 <b>because</b> 4: 9, 23: 8, 26:7, 28:22,
--	---	---	---

Transcript of Yulonda Wyche

Conducted on April 23, 2021

23

32: 5, 35: 5, 4 : 4, 46: 8, 48: 7, 49:3, 67:22 <b>become</b> 67:3 <b>been</b> 6:3, 7: 7, 8:5, 30:7, 30: 0, 32:2 , 33:3, 4 :9, 4 : 6, 42:5, 49:4, 49:5, 49:7, 49:9, 5 : 2, 5 : 3, 5 : 8, 65:2 , 74: 3 <b>before</b> 5:2 , 9:22, 39:22, 44:2 <b>begin</b> 28:6 <b>beginning</b> 3: 4, 8: 3 <b>behind</b> 46: 0, 47:6, 49: <b>being</b> 4:5, 2 : 8, 22:2 , 23:8, 34: , 37:20, 4 : 8, 42:7, 67:6, 67:7, 67:2 , 74:20 <b>believe</b> 8:9, 9:9, 9: 4, 2:6, 2: , 4: , 40:8, 40: , 50:20, 58: 7, 68: , 69: 5, 70:9 <b>besides</b> 8: 8 <b>best</b> 77: 2 <b>between</b> 2 :8, 76:2 <b>beyond</b> 8: 3, : 8	<b>bit</b> 7: 3, 49:22, 60: 8, 6 : 6, 66:22 <b>black</b> 55:4, 65: <b>blood</b> 7:2 , 7:22 <b>body</b> 20:8, 20: 4, 23: 7, 28: 5, 30: , 32:22, 33:4, 33: 6, 34:6, 38:4, 4 :6, 4 : , 4 : 9, 42: 7, 43:5, 43: 2, 43: 5, 44: 5, 46:8, 47: 0, 5 : 8, 56:4, 56:9, 56: 3, 58:6, 59:22, 60:2, 60:7, 60: 0, 6 :2 , 67:8, 69:4, 70: , 73: 6 <b>both</b> 6: 9, 20: 2, 22: 4, 32:7, 42:8, 47:9, 47: 6, 52: 0, 52: 4, 68:2 , 69:5 <b>bottom</b> 46:9, 56: 9 <b>brand</b> 43:22 <b>brandon</b> 3:2 , 3:22, 4:7 <b>break</b> 6:6, 60: 7, 60: 9, 73:2, 73:3 <b>breaks</b> 6:5 <b>briefly</b> 7:8, 39:5,	63: 0 <b>bring</b> 22: 6, 57: 0, 6 :3 <b>brought</b> 5:5 <b>bullet</b> 4 :4, 4 :7 <b>business</b> 7: 2, 7: 5 <b>busts</b> 62:9 <b>butler</b> 2:7, 5:4 <hr/> <b>C</b> <hr/> <b>call</b> 37: , 67: 8 <b>called</b> 26:3 <b>calls</b> 29: 2, 30: 8, 33:7, 5 :20, 58: 0, 59:3, 72:9 <b>came</b> 4:4, 54:8 <b>cameras</b> 26: 9, 26:20 <b>can't</b> 5:2 , 8: , 28: 2, 37: 0, 47:4, 54:3, 67:5 <b>cannot</b> :6, :9, 24:8, 40:20, 47: 5, 48: 2, 72: 6 <b>capability</b> 3 :4, 3 :6, 3 :9 <b>capacity</b> 5: 0, 28:6, 28: 0 <b>captain</b> 29:20 <b>capture</b> 23: , 26:7	<b>career</b> 7: 2 <b>carolina</b>  <b>case</b> 6: 6, 35: 2, 36:2 <b>category</b> 30:9, 43: 9 <b>caught</b> 0: , 4 : 6 <b>cause</b> 26: 3, 58: 7 <b>cavity</b> 38:4, 4 :6, 4 : 2, 4 : 9, 47: 0, 5 : 8, 64: 4, 69:4, 70: <b>ceased</b> 76:7 <b>cell</b> 23:6, 26: 8, 27: , 27: 0, 27: 4, 63:8, 7 : <b>cellophane</b> 49:6 <b>center</b> 7: 2, 0: 9, 2:3, 35: 0, 37:7, 62:8 <b>central</b> 20: , 37: 4 <b>centralized</b> 20: 8 <b>certain</b> 6: 6, 74:22 <b>certainty</b> 59: 3 <b>certificate</b> 7: 7, 7: 8, 77: <b>certification</b> 9:2, 9:6, 9: 0, 9: 6, 0:2, 0:6, 0:7, 0: 3, 3:5,
--	---	--	--

Transcript of Yulonda Wyche

Conducted on April 23, 2021

24

5:3, 9:20 <b>certifications</b> 8: 3, 8: 5 <b>certified</b> 9:5, 9: 4, 9: 7, 9: 9 <b>certify</b> 77:8 <b>characteristics</b> 38: 6, 47:5, 47:7, 47: 3, 47: 5, 49:7, 52: 6, 53:22, 55: 4, 59: 4, 62:5, 63:6, 69: 6, 74: 7, 75: <b>characterization</b> 55:9, 70: 9 <b>charge</b> 29: 8 <b>chart</b> 9:3 <b>checking</b> 2 :2 <b>checks</b> 20:22 <b>chesterfield</b> 7:2 <b>circled</b> 53:7 <b>circling</b> 32: 8 <b>circumstances</b> 70: <b>circumvent</b> 40:5, 45: 3 <b>city</b> 37: 0 <b>clarification</b> 27: 2, 45:4, 46: 3 <b>class</b> : 9, 3: 6 <b>classroom</b> 2: <b>clear</b> 43: 0, 47:8,	47:9, 5 : 2, 5 : 7, 63:22 <b>clearer</b> 46:2 <b>clearly</b> 50:5, 52:4 <b>cleveland</b> 7: 3 <b>click</b> 3 : 7 <b>client</b> 35:20 <b>close</b> 8: 2, 64: 4 <b>closed</b> 24: <b>coffeewood</b> 35: 0, 37:7, 37:8, 37:9 <b>collaboration</b> 6:2 , 7:2, 7: 9 <b>college</b> 7:7, 7: 4, 7: 7, 8:8 <b>coloration</b> 65: 2, 65: 3 <b>colorations</b> 65: 5 <b>com</b> 2: <b>combination</b> 6: 9, 22: 4 <b>come</b> 20: 9, 22: 0, 29: , 48:3, 60:20 <b>comes</b> 30:22, 73: 5 <b>commander</b> 2: 6 <b>comment</b> 70:6 <b>commonwealth</b> 0:3 <b>community</b> 7: 6, 8:8, 20: 3, 2 :7	<b>company</b> 0: 0, 0: 5, 6:22, 7:2, 7: , 2 : 9 <b>comparison</b> 9:3, 64:2 <b>complaint</b> 46: 9, 67:6, 67:7, 67: 0, 67: 7 <b>complete</b> 6:8 <b>completed</b> 39: 7 <b>compliance</b> 20:7, 20: 4, 2 : 5, 2 : 6 <b>comprised</b> 7:5 <b>computers</b> 23: 8 <b>concealed</b> 4 :5, 4 : <b>concern</b> 67: 9, 67:22 <b>concerned</b> 48:22 <b>concerns</b> 22:4 <b>concludes</b> 7:3 <b>conduct</b> 20:2 , 2 : 0 <b>conducted</b> :22, 3 :2 , 5 : , 5 :4 <b>conducting</b> 22: 5 <b>confer</b> 63: 6 <b>conference</b> 2:2 <b>confidential</b> : 9, 3: 0, 3: 4, 3: 5, 6: 7, 6:2 , 7:3, 8:5, 8:8 <b>confirmation</b> 63: 6, 65:22	<b>connected</b> 23: 9 <b>considered</b> 57:20 <b>consistent</b> 49:6, 7 :7 <b>constant</b> 63: 9 <b>consult</b> 22: 2, 7 : 5 <b>consulted</b> 66:5 <b>consumer</b> 9:4 <b>contact</b> 63: 5, 65:2 <b>contain</b> 3: 9 <b>contains</b> : 9 <b>content</b> 2 : 2 <b>continue</b> 6 : 5 <b>continued</b> 38: <b>contraband</b> 7:3, 7:6, 22:7, 34: 3, 34: 8, 34: 9, 4 :5, 4 : 0, 4 : 6, 4 : 8, 42:7, 49:4, 5 :8, 5 : 8, 56:6, 69: 8, 74:5, 74: 7, 75:2 <b>contractors</b> 42:3, 42:6, 64:7 <b>contributed</b> 39: 6 <b>contribution</b> 9:7 <b>conversation</b> 68:8, 68:9, 69: 0 <b>coordinator</b> 20:3
--	--	--	---

Transcript of Yulonda Wyche

Conducted on April 23, 2021

25

<b>correct</b> 8:3, 40: 5, 52:7, 52: 9, 53:8, 53:9, 62: 7, 63:2, 64:5, 73: 6, 74: , 74:5, 74:7, 74:9, 74: , 74: 7, 74: 8, 75:3, 75:7 <b>correctional</b> 8: 9, 9:7, 9: 0, 0: , 0: 8, 2:3, 2: , 35: 0, 37:7, 62:8, 74: 5 <b>correctional's</b> 8: 8 <b>corrections</b> : 3, 5:9, 9:6, 62: 8 <b>could</b> 6: 0, 6:7, 28:22, 3 : 7, 32: 3, 40: 6, 5 : 2, 5 : 3, 5 : 7, 52: 0, 57:20, 64: 5, 65:7, 74: 6, 76: <b>counsel</b> 2: , 2:3, 2: 3, 4:3, 4:8, 4: 3, 77: 4, 77: 7 <b>county</b> 77:4 <b>couple</b> 73: <b>course</b> 0: 4, 0:20, 0:2 , 49: 0 <b>courses</b> 8:8 <b>court</b> : , 4:3, 4: 4, 5:6, 5: 6,	27: , 32:2 , 33: , 33:2, 45:3, 46: 2 <b>courtesy</b> 5:22 <b>create</b> 30: 3 <b>creating</b> 5: 2 <b>criminal</b> 9:3 <b>current</b> 20: <b>currently</b> 0: 7, 5:8 <b>curwood</b> 2:7, 5:4 <b>cylinder</b> 62:4 <hr/> D <hr/> <b>dark</b> 50: 2 <b>darker</b> 56:22, 57:8 <b>data</b> 4 : 5 <b>date</b> 8: , 28:2, 28:7, 48: 3, 67:5 <b>day</b> 2:6, 3: 4, 4: 8, 77:20 <b>dcls</b> 2 :9 <b>dealt</b> 28:9 <b>decision</b> 72:3 <b>declared</b> 4:20 <b>defendant</b> : 5, 2: 3 <b>definitely</b> 29:5, 52: 5, 58: 8 <b>degree</b> 8:	<b>deleting</b> 28: <b>dense</b> 57:3, 57:4 <b>denser</b> 57:6 <b>density</b> 56:2 , 57:8, 65:8 <b>department</b> : 3, 5:9, 8: 6, 20:3, 2 :8, 2 : 9, 30: 0, 33: 2, 33: 4, 62: 8, 67: , 68:2 <b>depends</b> 25: 2 <b>depos</b> 2:28 <b>deposition</b> :2 , 76:7, 76:9, 77:7, 77:9, 77: 5 <b>depth</b> 7: 3 <b>described</b> 62:2 <b>description</b> 3:7 <b>designate</b> 6: 6, 6: 8, 8:4 <b>designated</b> 6:20, 8:5 <b>detected</b> 63: 2, 63: 4 <b>determine</b> 42:9 <b>determines</b> 28:6 <b>develop</b> 7:22, 8:9, 8: 6 <b>developed</b> 6: 8, 6:20, 6:2 , 7:2, 7: 9	<b>device</b> 23: 2, 40:22 <b>difference</b> 0 <b>different</b> 42:22, 53:2, 57:9, 6 :9, 63:22 <b>diploma</b> 0:6 <b>direct</b> 24: 0 <b>direction</b> 77: 3 <b>directly</b> 23: 0, 23: 7, 62: 3 <b>discrimination</b> 5:8 <b>discussed</b> 74: 3 <b>discussion</b> 76:4 <b>distortion</b> 45:2 <b>district</b> : , :2, 5:6, 5:7 <b>division</b> :3, 5:7 <b>document</b> 7: 6, 8:7, 39:2, 6 :5 <b>doing</b> 22: 7, 43: <b>done</b> 5: 7, 24: 5, 48:20 <b>dosage</b> 64:22, 65:2, 65:3, 65:5, 65: 8 <b>dosing</b> 9:2 <b>double-checking</b> 75:20 <b>down</b> 66: 0
---	---	--	--



## CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

26

drawing 7:2 drive 24: , 24: 3, 24: 8, 30: 3 driver's 8: 4, 32: 6 dropped 9: 8 drug 20: 2, 2 :4, 2 :6, 62:9 dual 25:22, 63:2 , 64: , 64:20, 65: 4 duly 77:9 during 0: 6, 37:3, 48:9 duties 2: 3, 20:4, 20: 6, 22:6 <hr/> <b>E</b> <hr/> e-mail 23:4, 23: 0, 23: 7, 25: 0, 37:2 earlier 4: 8, 23:22, 39:6, 59:20, 68:7 earn 0: 3 education 7:6 eeo 34:22, 35:4, 35: 2, 36: 8, 36:20, 68:2 ein 32: 6 either 8:2, 9: 8, 47: 6, 49:5 electric 45:2, 45:5,	45:7, 54: , 54: 6, 55:5 electrical 55: 3 else 8: 8, 47: 0 employed 77: 4, 77: 7 employee 32:4, 32:8, 35: 4, 37:22, 38: 7, 77: 7 employee's 35: 2, 36: 5 employees 40:4, 74: 6 employment 35: 5, 36:3, 38: 8, 38:2 end 9: 5, 8: 3, 29:4, 44:2 , 45: 4, 50: 6, 54: 5, 6 : 3 endeavor 5:22 ending 3: 5 enough 4:22 entire 3: 4, 4:5 equipment 0: 6, 5: , 43:2 equipped 5:8 esq 2:6, 2: 6, 2: 7 est :25, 4:2 ever 3: , 24: 7, 32:2 every 30: 2, 57:2 , 58:6, 73: 5, 73: 9, 74:	everyone 60:20 exact 5:2 , 6:2, 6: 3, 8: , 48: 3, 53:3, 67:5 exactly 68: , 72: 6 examination 3:3, 3:4, 4:22, 73:9, 75: examinations 3: examined 4:2 example 74:2 examples 6 :9, 74:20 exhibit 3:8, 7: 8, 39:6, 6 :3, 74: 4 exhibits 3:6 expect 6:3 expectation 27:9, 27: 3 experience 9: 2, 26: 5, 28:8, 30: 0, 4 :9, 42:5, 42:7, 49: , 74:2 experienced 63: 6 experiences 34: 6 experiencing 44:7 expert 32:22, 33:3, 33: , 33: 2, 33: 4 explain 35:3, 37: 8,	37: 9, 76:2 expressed 67:22 extent 29: 2, 30: 8, 35: 9, 5 :20, 53: 5, 59:3, 72:9 externally 30: extremity 46:8 <hr/> <b>F</b> <hr/> facebook 62: 8 facilities 5:8, 5: 0, 2 :7, 2 :2 , 22:22, 3 :8 facility 0: 7, 29: 5, 35:8, 66:6, 74:5 facing 49: 4 fact 4: , 33: 0, 48:9, 74:8 falabella 2:6, 3:3, 5: , 5:3, 60: 6, 6 : , 72:20, 73:5, 73: 8, 74:6, 74: 0, 75: 2, 75: 7 fall 28:7 far 26:7, 27:22, 63:9 favorite 63:9 federal 34:22, 36:20 female 38: , 42:8, 42:9, 73: 9, 74:
---	---	---	---

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## CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

27

<b>females</b> 74:3	<b>following</b> 6:20	<b>gives</b> 64: 3	<b>grievance</b> 33:20, 33:2 ,
<b>few</b> :2	<b>follows</b> 4:2	<b>go</b> :3, 22: 8,	34: 2
<b>file</b> 3 :	<b>foregoing</b> 77:7	24:8, 33:8,	<b>grievances</b> 34: 6
<b>filed</b> 6: 7	<b>forget</b> 2 :2	35:22, 37:6,	<b>guess</b> 24: 0, 25: 0,
<b>financially</b> 77: 8	<b>forgive</b> 50: 6	45:2 , 48: 8,	56: 2, 62: ,
<b>find</b> 45: 2, 6 : 2	<b>forgoing</b> 77:9	73:4	72:5
<b>fine</b> 6:5	<b>form</b> 25:5, 27:5,	<b>goal</b> 74: 4	<b>guidance</b> 74: 5
<b>finish</b> 5:2	7 : 9, 73: 8,	<b>goes</b> 28: , 73: 9	<hr/> <b>H</b> <hr/>
<b>firm</b> 5:4	74:6, 74: 0	<b>going</b> 6: 8, 2 :2 ,	<b>halfway</b> 45: 7
<b>first</b> 20: 5, 40:6,	<b>formally</b> 4:4	40:3, 6 :3,	<b>hands-on</b> :3, 9: 2
46:2, 48: 6,	<b>foundation</b> 25:5, 27:5	64: 9, 69:20	<b>hanging</b> 46:
54: 9, 54:20,	<b>frequently</b> 6:3	<b>gonna</b> 25:4, 45: 5,	<b>happen</b> 62:
60:7, 67:3,	<b>front</b> 2: 7	53: , 58:4,	<b>happened</b> 28: 8
67: 3, 75: 3	<b>full</b> 26:2, 26:8	70: 8	<b>happens</b> 66:2, 66:5
<b>five</b> : 7	<b>further</b> 72:2 , 75:6,	<b>good</b> 5:2, 30: 6,	<b>hard</b> 5: 6, 59: 2
<b>flip</b> 44: 9, 45: 5	75: 0, 75: ,	75: 9, 75:2	<b>harrisonburg</b> :3, 5:7
<b>flores</b> :7, 2:26, 5:5,	75: 7, 75:22,	<b>google</b> 60:	<b>head</b> 5: 5, 66:6
66:22, 67:4,	77: 6	<b>gotcha</b> 8: , 9:22,	<b>headquarters</b> 3:9
67: 2	<hr/> <b>G</b> <hr/>	26: 5, 32: 7	<b>heard</b> 5: 2, 6: 3,
<b>flow</b> 44:7	<b>gave</b> 64: 0, 74: 9	<b>govern</b> 7:9	4: 7, 23:2 ,
<b>flynn</b> 2: 7	<b>general</b> 2: 8, 36:8	<b>graduate</b> 7:7, 7:8	23:22, 27: 5,
<b>focus</b> 53:2	<b>generated</b> 65:6	<b>graduated</b> 8:20	67: 4, 68:7,
<b>folder</b> 3 :20	<b>genesis</b> 4 :2	<b>gray</b> 65:	72: 3
<b>folks</b> :4, :8,	<b>gestures</b> 5: 5	<b>great</b> 6: 0	<b>hearing</b> 34: , 34: 2,
: 0, : 5,	<b>give</b> 5: 4	<b>green</b> :32, 77:6,	68: 4
3: , 3: 5,	<b>given</b> : , 5: 7,	77:23	<b>hearings</b> 33: 8, 33:20,
48: 5	63: 9	<b>greensville</b> 0: 8, :5,	33:2
<b>follow-up</b> 57: 3, 58: 5,		2:3, 55: 8	<b>heavy</b> 44:7
73: 2		<b>gregorio</b> 4:2, 4:3,	<b>help</b> 8: 5
		8: , 8: 8,	
		8:2 , 39: 5	

PLANET DEPOS

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## Transcript of Yulonda Wyche

Conducted on April 23, 2021

28

<p><b>helped</b> 7:2 , 39: 3</p> <p><b>helpful</b> 9:8, 52:20, 53: 7</p> <p><b>here</b> 5: 0, 6: 4, 3:9, 3: 0, 40:3, 4 :2, 4 :4, 4 : 4, 42: , 43: 0, 46:7, 49: 8, 50: 3, 5 : 7, 55:3, 55:2 , 56: 6, 57: , 60: 7, 6 :4, 62:2, 62:3, 64: , 67: 6, 68:2, 73: 4, 74: 3</p> <p><b>here's</b> 59: 7, 59:2 , 70: 3</p> <p><b>hereby</b> 4: 5, 76: 0, 77:7</p> <p><b>heroin</b> 62:7</p> <p><b>high</b> 7:7, 7:8, 7: , 64:22</p> <p><b>higher</b> 63: 5, 63:20, 64: 3, 64: 6, 64: 7, 64: 8, 64:20, 65: 8, 66:</p> <p><b>highest</b> 7:5</p> <p><b>himself</b> 9: 0</p> <p><b>historical</b> 27: 9, 28: , 3 :</p> <p><b>history</b> 62:9</p> <p><b>honest</b> 48: 3</p>	<p><b>honestly</b> :6, :9, : , : 8, 6: , 37: 0, 69:9</p> <p><b>horizontal</b> 50:6</p> <p><b>hours</b> 7 :4</p> <p><b>however</b> 28:5</p> <p><b>hr</b> 68:3</p> <p><b>human</b> 52:2, 57: 5, 57: 7</p> <hr/> <p style="text-align: center;"><b>I</b></p> <hr/> <p><b>id</b> 32:4, 32:5, 32:8</p> <p><b>idea</b> 44:20</p> <p><b>identification</b> 25:2, 32: , 32: 5</p> <p><b>identified</b> 60:9, 77:9</p> <p><b>identify</b> 25:7, 35:4, 48: 7</p> <p><b>identifying</b> 25: 6, 25:2 , 26:5</p> <p><b>ii</b> 46: 8, 47: 9, 48:</p> <p><b>image</b> 25: , 25:2, 25: 0, 26:5, 26:9, 26: 2, 32:2, 37:20, 40:7, 42: 7, 42: 8, 42:20, 43: , 43: 2, 43: 6, 43: 7, 43:2 , 44: 6, 46: , 46:7,</p>	<p>46:9, 46: 6, 47:2, 48:4, 48:6, 49: 4, 53: , 53:3, 53:6, 53: 6, 56:4, 56: 0, 56: 4, 56: 8, 57: 2, 59:20, 60:2, 60:8, 60:9, 60: 0, 6 :2 , 64: , 65: , 67:8, 70: 3, 7 :5</p> <p><b>images</b> 7:6, 9:5, 9:9, 9: 4, 9: 7, 23:9, 23: 6, 24: 2, 24: 7, 27: 7, 28:5, 28:6, 28: , 28: 8, 28:22, 29:7, 29:8, 30: , 3 : 8, 32:22, 33:4, 34: , 40:4, 44: 4, 44:22, 45: 2, 47:2, 5 :2 , 53: 9, 53:2 , 55:20, 65:6, 65: 2, 65: 3, 68:9, 68: 5, 68: 7, 68:2 , 69: , 69:5, 69:8, 70:22, 7 :3, 7 : 2, 7 : 4, 7 : 5, 7 : 7, 72: , 72: 5</p> <p><b>important</b> 5: 4</p> <p><b>in-person</b> 37:4</p> <p><b>inartful</b> 58:4</p> <p><b>incident</b> 47: 8, 48: , 63:</p>	<p><b>include</b> 25: 6</p> <p><b>increased</b> 65: 3</p> <p><b>increasing</b> 65:5</p> <p><b>index</b> 3:</p> <p><b>individual</b> 3 : 2, 3 : 5, 3 :2 , 32: 2, 63: 8, 63:20, 65:22, 75: 4</p> <p><b>individual's</b> 27:20</p> <p><b>individuals</b> 64:8, 64: 9</p> <p><b>information</b> : 9, 6: 6, 7:7, 7: 0, 25: 7, 25:2 , 26:5, 35:20, 39: 6, 74:3</p> <p><b>initial</b> 0: 6</p> <p><b>initially</b> 3 :20</p> <p><b>input</b> 8:2 , 9:</p> <p><b>inquired</b> 50:20</p> <p><b>inquiries</b> 22:3, 22: 0</p> <p><b>inquiring</b> 28:2</p> <p><b>insert</b> 7:7</p> <p><b>inserted</b> 9: 7, 42: 6, 45: 0, 46:9, 70:3</p> <p><b>inside</b> 62:6</p> <p><b>installation</b> 0: 6</p> <p><b>installs</b> 2 :20</p> <p><b>instances</b> 54:7</p>
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## CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

29

instant 76:7 instead 4:6 institute 9: , 0:4 institution 8:2 institutional 8:20, 2:8 institutions 20: 3, 2 :7 instructed 0: 5 instructions 5: 3, 22:2 instructor 3: 7, 3:20 interaction 36:22 interested 32: , 77: 9 internal 4 :6, 4 : , 4 : 9 internet 42: 9, 43:8 interruption 27: , 45:3, 46: 2 interview 37:3, 37:4 investigate 58:7, 75:7 investigation 48:9, 57: 3, 57:22, 58: 5 investigator 8:20, 2:8, 9: , 35:5, 37: , 37: 7, 38:6, 48:5, 48:8, 55:22 involve 34: 3, 34: 7 involved 20:5, 35:9, 47: 9, 55: 7,	62: 3 issue 33: 5, 75:7 issued 26: 8, 26:20 issues 28: 5 item 47: 6, 57:3, 62:3, 74:20 itself 0: 5, 25: , 26: 2 <hr/> J jamie 8: 4 jane 7: 2 job :28, 2: 3, 20: , 20:4, 20: 6 john 2:27 joyce :7, 2:26, 5:4, 66:22, 67:4, 67: 2 july 20: 0, 3 :6, 40: <hr/> K k9 66:3 keep 8:8, 27: 9 kidd 8: 5, 8: 9, 9:8, 40: 0, 40: , 56:2, 56: 5 kidd's 9:6 kind 25: , 27: 9, 3 : 8, 50:6,	56:2 , 58: 2 knot 46: 0, 46: 4, 49: , 49:7, 49: 2, 49: 3, 50:9, 53:5, 69: 9 know 7:20, : 3, : 4, : 9, 4: 8, 5: 5, 5: 6, 6:4, 6: 0, 7:8, 25:9, 25: 4, 27:22, 29: 0, 29: 4, 30:4, 30:9, 30: , 30: 2, 30: 9, 30:20, 3 :8, 3 : 5, 34:3, 35: 7, 36:2, 36:6, 36: , 37: 3, 38: 3, 38:2 , 39: 5, 40: 9, 43:2, 43: 9, 43:22, 44:2, 44:3, 44:6, 44: 0, 44: 8, 44: 9, 47:22, 48: 0, 48: 6, 49: , 50:2 , 50:22, 5 :3, 5 :6, 5 :8, 52:5, 52: 8, 54:8, 56: 2, 57:6, 57: , 58:3, 58: 4, 59:6, 59:8, 59: 0, 60: , 60:6, 60:9, 6 : 3, 65:22, 66: 2, 73: knowledge 9: 2, 28:2, 28: 2, 3 :5, 3 :7, 3 : 0, 53: 8, 67: 3	knowledgeable 27: 6 <hr/> L lab 7:2 laboratory 2 :9 largest 62:9 last 8:7, 2:5, 3: 3, 2 : 3 later 7: 3 law 5:4 lawsuit 5:5, 67: 7 lawyer 5:3 least 40: 2 leave 8:4 led 0: 5 left 46: , 49: 5 legal 33:7 let's 9:22, 38:22, 4 :2, 42: , 45: , 45:2 , 46:4, 52:22, 54: 4, 54: 9, 54:20, 56: 6, 60: 7, 60: 9, 6 : 2, 66:22 letting 48: 6 level 7:5 liaison 2 :8, 2 : 8, 22:6, 29: 6 license 8: 3, 8: 4,
---	---	--	---

PLANET DEPOS

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## CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

30

32: 6 lieu 4:4 lieutenant 2: , 2: 2 light 56:20, 57: 0 lighter 56:22, 57:9 lightness 57: likely 26: line 3: 4, 3: 5 listing 3 : 7, 3 :2 little 49: 9, 49:22, 6 : 6 location 75: 4 logistics 7: 6 lokey 30:6 long 6:4, 2:4, 3: 3 longer 30: look 7: 2, 22: 6, 38:22, 4 :2, 42: , 42: 7, 44: 3, 48:6, 52:22, 53:5, 54: 4, 54: 9, 54:20, 69: 2, 73:3, 74: 6 looked 39:5, 53:2, 56:6, 60:2, 60:8, 6 :8, 65: 0 looking 25: , 4 :3, 43:22, 63:4,	63: looks 59: 8, 59:2 lot 9:5, 22:20, 26:5, 60: 8 low 64: 9, 64:20, 64:2 , 64:22, 65:2 lower 38:4, 46:7, 46:8, 64: 4, 69:3, 69:22 lowest 65:3 <hr/> M machine 2:2 , 5: , 9: 3, 23: 0, 24: 2, 24: 4, 28: 5, 29: 8, 30: 2, 3 :3, 43: , 57:9 machines 7:6, 9:9, 25: 5, 27: 8, 28:9, 30:2 , 32:6, 40:9 made 2 :20, 29: , 46: 9, 67:6, 67:7, 67: 0 majored 7: 5 majority 22:20, 23:4, 4 : 7 majorly 4 : 8 make 5: 8, 6: , 6:8, 7: 3, 2 :22, 30:22, 72:3, 73: 2 making 2 : 9	male 42:8, 42: 0 man 37:22 management 9: , 0:4, 0:8 manager 9:6, 20: 2, 20: 4, 20: 6, 20:2 , 68:3 manufacturer's 22: many :4, : 9, 3: 5, 28:5, 33:22, 68: 7 march 62: 2 mark 8:2 marked 3:6, 7: 7, 45:22 martin 4:2, 8: material 3:20, 57:6, 6 : 0, 65: 0 materials 4: 2, 4: 5, 6: 4, 6: 7, 6:20, 7:4, 7: 8, 7:22, 8: 0, 8: 5, 8:22, 39: , 39:8, 39: 7, 43: 2, 44: 4, 59: 6, 6 :7 matter 34:4, 67:2 maybe 8: 3, 28:4, 29:4, 73:4 mean 4:20, 24:6, 36: , 40:9, 50:5, 67: 7	meaning 24:7, 30: 2, 52: , 53:22 means 4:2 media 62:20, 62:2 medium 64:22 meeting 72: 8 member 25:3, 7 :22 menstruating 44:4 menstruation 44:7 mentioned 63: , 67:2 might 23:22, 25:9, 26:8, 26: 3, 44:20 minute 9:22, 24:2 , 60: 9, 73:3 mischaracterizes 53: 6 misquote 36: 4 miss 36: 4 missing 22: 9, 26: 4 mixing 67: 5 mobile 5:9 month 30: 2 more :8, : 0, : 5, : 6, : 7, 5: 8, 5:20, 6: , 6:4, 6:8, 6: 0, 7: 3, 26: , 28:3,
---	--	--	--

PLANET DEPOS

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## CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

31

42:9, 48:22, 57: 0, 60: 8 <b>most</b> 4 :4, 4 : 0, 4 :20 <b>must</b> 58:22 <b>mute</b> 70: 8, 70:2 , 73: 3 <b>myself</b> 3: 7	57: 4, 57: 6, 59: 8 <b>north</b> 2: 9, 7: , 77:3 <b>notary</b> 77:24 <b>note</b> 3: 9, 8:3, 25:4, 27:4, 29: , 33:6, 35: 6, 38: , 53: , 53: 3, 55:8, 58:9 <b>notes</b> 3 : , 73:3 <b>nothing</b> 75:9, 75:22 <b>notice</b> 48: 7 <b>noticed</b> 8: 4 <b>november</b> 55: 8 <b>number</b> 5:22, 6:2, 32:8, 32: , 32: 3, 66: 7 <b>numbers</b> 32: 6, 42:9 <b>numerous</b> 5: 6	73: 8, 74:6, 74: 0 <b>obtain</b> 9: 4, 56: 3 <b>obtained</b> 7:6, 9: 6, 40:7 <b>obtaining</b> 9:8 <b>obviously</b> 27: 6, 45: 6 <b>occasion</b> 5:3, 23:5 <b>occasions</b> 2:22 <b>occur</b> 3:8 <b>occurred</b> 29:3, 47:20 <b>offender</b> 20: 2, 2 :4, 2 :6 <b>offenders</b> 20: 9 <b>offered</b> 5: <b>office</b> 2: 8, 22: , 36: 8 <b>officer</b> 8: 8, 8: 9 <b>often</b> 5:6, 25:8, 74:4 <b>oh</b> :6, 39:9 <b>ohio</b> 7: 3 <b>once</b> 29: , 39: 5, 39: 6, 48:20, 65:20 <b>one</b> 9: 8, 3: 8, 7: 8, 25: 5, 26:2, 28:4, 34: , 34:2, 34:2 , 39:6,	40:6, 40: 0, 40: , 42: 9, 45:5, 45: 9, 45:22, 46:2, 46:4, 47: 2, 47: 4, 48:22, 49: , 52: 0, 52: 4, 52: 5, 53:7, 54: 3, 54: 8, 59: 5, 6 :3, 6 : 7, 6 : 8, 6 :20, 62:8, 63:8, 73: 5, 74: 4 <b>ones</b> 2 : 0 <b>online</b> 0:20, 3:6, 5: 3 <b>only</b> 29:8, 45: 6, 53:7, 65:7 <b>operate</b> 2:2 <b>operated</b> 3:2 <b>operating</b> 9: 3, 2 :22, 66: 5 <b>operation</b> 4:22, 7: 0 <b>operations</b> 2: 5, 2: 8 <b>operator</b> 9: 4, 9: 0, 46:20, 63: 6 <b>operators</b> 5: 3 <b>opinion</b> 33:7, 38:5, 38:8, 70: 4 <b>order</b> 6: 5, 6: 9, 8:6 <b>other</b> 8: 2, 9:2 , 7: 0, 9: 9, 22:3, 34: 5,
<b>N</b>			
<b>name</b> 5:2, 6: 0, 25:7, 25: 0, 25: , 26: 3, 32:4, 32:7, 36: 6, 67:5, 67: 4, 67:2 <b>names</b> 34:3 <b>nature</b> 75: <b>necessarily</b> 34:3, 65: 7 <b>need</b> 6:5, 6:7, 34:3, 73:5 <b>needed</b> 28:20, 32: 9 <b>neither</b> 77: 3 <b>network</b> 9:3, 23:20 <b>networked</b> 23: 9 <b>next</b> 56:3, 66:2, 66:5, 75:6 <b>no:-cv</b> : <b>nods</b> 5: 5 <b>norfolk</b> 36: 9 <b>normal</b> 5 : 3, 52:2,	<b>O</b>		
	<b>object</b> 4:9, 50:6, 50: , 58:5, 59:8, 70: 8 <b>objection</b> 25:5, 27:4, 29: , 30: 7, 33:7, 35: 6, 36:9, 38: 2, 38:20, 5 : 9, 52:8, 52: 2, 53: 2, 53: 3, 55:8, 58:9, 59:2, 60:3, 60: 3, 72:8,		

PLANET DEPOS

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## CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

32

43:5, 50: , 5 :3, 53: 8, 53:2 , 58:2 , 6 :6, 63:3, 7 : 8 <b>others</b> 4:22, 5:4, 6: 5, 57:7, 6 :9 <b>otherwise</b> 33:3, 77: 8 <b>out</b> 4:8, 4:9, 22: 2, 4 : 9, 48:2 , 59: 5, 6 : 6, 68:4 <b>outcome</b> 36:2, 36:5, 50:2 , 77: 9 <b>outlining</b> 53:4 <b>outset</b> 67: <b>outside</b> 24:8 <b>outsider</b> 9:4 <b>oval</b> 46: 0, 50:3, 53:4, 69: 8 <b>over</b> 22: 0, 73:3 <b>overhang</b> 49: 9, 50: <b>oversee</b> 2: 5, 2: 7 <b>overseer</b> 20:7	40:3, 4 :2, 45:22, 52:2 , 62:20, 62:2 <b>pages</b> :30, 44: 9 <b>paper</b> 55:4, 55: 2 <b>part</b> 20: 5, 20: 6, 2 : 3, 37: 2, 52:2, 57: 4, 57: 6 <b>particular</b> 43: 7 <b>particulars</b> 48: 0, 67:20 <b>parties</b> 77: 5, 77: 8 <b>paul</b> 2:6, 5:3, 8:3, 70: 7, 73: <b>paul@butlercurwo-</b> <b>od</b> 2: <b>pelvic</b> 56:20 <b>penalties</b> 4:8, 4: 6, 77: 0 <b>pending</b> 6:7 <b>penetration</b> 65:8 <b>perfectly</b> 5 : 2 <b>perjury</b> 4:8, 4: 6, 77: 0 <b>permission</b> 63: 9 <b>person</b> 0:2 , 0:22, 3:6, 3:7, 23:8, 43:2 , 44: 5, 5 :4, 64:4, 66:4, 7 :2 <b>personal</b> 26: 7, 26: 8,	27: , 27:9, 27: 4 <b>personally</b> 25: 5, 55: 7 <b>phlebotomist</b> 7: 9 <b>phlebotomy</b> 7: 7, 7: 9, 7:20 <b>phone</b> 23:6, 27: , 37: , 63:8, 68: 6, 7 : , 7 : 7 <b>phones</b> 26: 8, 27: 0, 27: 4 <b>photos</b> 64:2 <b>physically</b> : , 9: 6 <b>picture</b> 23: 2, 23: 4, 25: 2, 26:6, 26:9, 26: 2, 26: 6, 27:2, 40: 3, 40: 8, 40:20, 40:22, 42: 6, 43:3, 43:6, 44:4, 44:8, 55: , 64: , 64: 4 <b>pictures</b> 24:22 <b>piece</b> 35:3 <b>place</b> 4 : 7 <b>placed</b> 4 : 3 <b>plaintiff</b> :9, 2:3, 2:26 <b>planet</b> 2:28 <b>plc</b> 2:7 <b>please</b> 4:4	<b>plug</b> 24: , 24: 3, 30: 3 <b>point</b> 6:5, 4 :4, 4 :7, 4 : 3, 4 : 9 <b>pointed</b> 48:2 <b>police</b> 9: <b>policy</b> 7:8, 20:6, 2 : 2, 2 :2 , 22: , 27: , 58:22, 66: , 66: 2, 66: 3 <b>portion</b> 3: 4, 3: 5, 6:20, 7:3 <b>position</b> 20:9, 69:22 <b>positively</b> 54:4 <b>possession</b> 48:3 <b>possible</b> 50:4, 66: <b>possibly</b> 26:8, 42: 7, 65:7 <b>post</b> 20:6 <b>powerpoint</b> : , 39: 0, 39: 9 <b>preferably</b> 63:2 <b>prepare</b> 39: 3, 42: 2 <b>present</b> 2:25, 4:5, 34:22, 37:3, 47:2 , 52: , 58: 6, 66:3, 69: 6, 72: 5 <b>presentation</b> :2, 66: 8
--	---	--	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Yulonda Wyche

Conducted on April 23, 2021

33

presented 3 : 6 previous 64:3, 64:4 previously 3:6, 7: 7 privacy 34: privileged 35:2 probably 4: 7, 7: 2, 29: 5, 60: 8, 72: 3 procedure 66: 5 proceed 7 :3 proceeding 4: 0 proceedings 5: 7 process 40:5, 45: 3 processed 20:20, 20:2 products 9:4 professional 8: 3, 8: 5 program 20:3 pronounce 0: 0 protective 6: 5, 6: 9, 8:6 protocol 63: 2, 63: 3, 64:6, 66:2, 66: 0, 7 :8 protruding 56: 9 provide 4:20, 8:22, 9: 2, 37: 9, 38:5, 7 : 0, 74: 2, 74: 5	provided 7: , 9: , 9:5, 40: 0, 40: , 56: 5, 74:3 providing 22:2 public 77:24 publically 6: 7 pull 3 : 6, 32:7 pulling 32: pulls 3 : 9 purchases 2 :20 purpose 4: 9 put 25:9, 32: , 56: 4 <hr/> Q qualified 32:2 , 33:3 quantify 5: 6 question 5:2 , 6:6, 6: 8, 5:9, 24: , 30: 6, 5 : 5, 5 : 6, 58: , 58:4, 60:6 questioned 5 :6, 73:2 questions 6:7, 22:3, 58: , 58: 9, 72:2 , 73: 2, 75: 8 quite :2 , 27: 6 quoted 3: 9 <hr/> R radiation 9:2, 34:9,	34: 0, 65:2, 65:5 ran 63:20, 64:8, 64: , 64: 6, 64: 9 rather 5: 5, 33: 0 reached 28:9, 68:4 read 3:20, 47:9 readiness 20:5 reading 32:22, 33:4, 76:2, 76:5, 76:8 really 28:2 reason 46: 8 reasonably 47: 3, 58: 7, 59: 5 recall :6, :9, 4:5, 23:5, 28:20, 32: 9, 34: , 35:6, 35:8, 35: , 36:7, 36: 5, 36: 8, 39:20, 39:22, 40:2, 40:20, 43:7, 44: 4, 48: 2, 50: 6, 50: 9, 56: , 66: 7, 67:5, 67:20, 68: , 68: 5, 69:9, 69: 2, 70:6, 72: , 72:4 receive 4:2 received 9:2, 9:5, 9: 0, 9: 6, 5:2, 9:20, 24: 7, 24:22, 42: 9,	46: 6 receiving 23:5, 24:2 recess 60:22, 73:8 recollection 29:2, 29:6, 40:7, 46: 5, 72: 8 recommendation 7 : record 6: , 6: 5, 27: 2, 27: 9, 28: , 43:20, 45:4, 46: 3, 52:2 , 6 :2, 62: 0, 76:4 records 3 : recovered 28:22, 4 : 8, 42:8, 44:22, 49:4, 5 :9, 54:22, 55:5, 55: 2, 62:4, 62:7 red 53:7 reduced 77: 2 referenced 3:6 referred 2 :3, 23:2 referring 50:8, 50: 2 reflect 54:2 reflected 6 :7 reflective 65: 3, 65: 4 regarding 7 : 5, 76:4 region 37: 4 regnery 2: 6, 3:4,
---	---	--	---

## Transcript of Yulonda Wyche

Conducted on April 23, 2021

34

: 2, 8:2, 25:4, 27:4, 27:8, 29: , 30: 7, 33:6, 35: 6, 35: 8, 36:9, 38: , 38:20, 5 : 4, 5 : 9, 52:8, 52: 2, 53: , 53: 5, 55:8, 58:9, 59:2, 60:3, 60: 3, 60:2 , 70: 7, 72:8, 72:22, 73: , 73:7, 73: 0, 75:9, 75: 9 <b>related</b> 8:7, 77: 4 <b>relative</b> 77: 6 <b>relevancy</b> 35: 9, 36: <b>remain</b> 63: 8 <b>remember</b> :2 , 36: 2, 36:20, 37: 0, 46: 8, 68:9, 68: 2, 68: 7, 72: 6 <b>remind</b> 5: 3, 49:3 <b>remote</b> 76:7, 76:9 <b>remotely</b> 2:4, 2: 4 <b>repair</b> 28:20, 29: , 32: 8, 32: 9 <b>reported</b> :32 <b>reporter</b> 4:3, 4:5, 4: 4, 5: 6, 27: , 45:3, 46: 2, 77: , 77:6, 77:23	<b>reporter's</b> 3: 9 <b>represent</b> 5:4, 67: <b>reproduced</b> 3:20 <b>requests</b> 27: , 45:3, 46: 2 <b>require</b> 57:2 <b>reserved</b> 76: 0 <b>respond</b> 60: 5 <b>response</b> 70:20 <b>responsible</b> 2 : 7 <b>result</b> 47:22, 50: 7 <b>resulted</b> 34: 7 <b>retrieved</b> 4 : 5 <b>return</b> 5:22 <b>revealed</b> 55:3 <b>review</b> 22:6, 22: 8, 39: 8, 67:2 <b>reviewed</b> 39: 9, 40:2 <b>reviewing</b> 49:9 <b>richmond</b> :23, 2:9, 2:20, 5:3, 3: 0, 22: , 36: 9 <b>right</b> 5:20, 6:3, 6: 3, 7: , 0:7, 0:9, 3:4, 3: 2, 6:9, 6: 4, 7:2 , 9: 9,	2 : 3, 22:5, 23:9, 24:20, 26:4, 26:7, 26: 3, 30:8, 32: 7, 33:2 , 35: , 37: 5, 40: 4, 4 :2, 43: 3, 45: , 45: 5, 49: 9, 52: 7, 52:20, 54:22, 55:6, 6 :2, 63: , 63:3, 63:8, 63: 0, 64: 0, 65:20, 66:9, 66:2 , 68:6, 70:4, 70: 0, 73: , 75: 5 <b>robb</b> 2: 7 <b>robinson</b> 72: 4, 72: 5, 72: 7 <b>role</b> 2:8, 2: 0, 22:6, 35: <b>ron</b> 58:5, 73:6 <b>ronald</b> 2: 6 <b>room</b> 2:2 <b>rregnery@oag</b> 2:22 <b>rule</b> 59: 5 <b>rules</b> 7:8 <b>run</b> 66: <hr/> <b>S</b> <hr/> <b>safe</b> 8:4 <b>safety</b> 34:7, 34:8, 34: 0 <b>said</b> 5: 5, 27: 3,	29:22, 64: 6, 67: , 70:9, 77: <b>same</b> 7: 4, 45: 9, 52:8, 52: 2, 53: , 53:3, 72: 8 <b>samples</b> 2 : <b>sarah</b> 2: 7 <b>saw</b> 9:3, 46:2 , 7 : , 7 : 4, 7 : 7 <b>say</b> 6: 3, 6: 4, 8:9, 4: 8, 8: , 8: 2, 28: 2, 29:4, 32: 4, 33:2, 4 :20, 47:2, 47:4, 47: , 47: 3, 48:5, 52:3, 54:4, 59: 2, 67: 6, 70:4 <b>saying</b> 58:5, 58: , 59:2 , 67: 6 <b>says</b> 4 :4, 55:3, 57:7 <b>scale</b> 65: <b>scan</b> 28: 5, 30: , 30:22, 3 : , 3 :2, 32: , 32:22, 33:4, 35: 5, 42: 7, 47:9, 50: 7, 5 : 3, 56:4, 56:9, 56: 3, 57: 2, 58:6, 59: 9, 6 : 6, 6 :2 , 63: ,
---	---	--	--

CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

35

65: 8, 67:8, 75: 4 <b>scanned</b> 43: 5, 44: 5 <b>scanner</b> 3:2, 20: 4, 33: 6, 43:5, 59:22, 60:2, 60:7, 60: 0, 64:9, 73:20 <b>scanners</b> 5:4, 20:8, 23: 7, 34:6, 53: 9, 73: 6 <b>scanning</b> 43: 3 <b>scans</b> 22:7, 22: 8, 22:2 , 27: 8, 27:20, 3 : 7, 3 :2 , 49:9, 6 :8, 63:4, 63:5, 63: , 64:3, 64:4, 65:9, 67:22 <b>school</b> 7:7, 7:9, 7: , 8:4, 8:2 <b>screen</b> 7: 6, 25: 3, 25: 6, 25:20, 26: 6, 32:2, 39:2, 40: 4, 40: 8, 40:22, 48: 8, 53: 3, 56:22, 6 :5 <b>screening</b> 3:8 <b>screens</b> 25:22 <b>search</b> 3 : 4, 40:5, 43:6, 50:22, 5 :3, 55:3, 66:4, 66: 3, 66: 4 <b>searchable</b> 3 : 2, 32:3,	32:4 <b>searched</b> 73:2 <b>seat</b> 63: 8 <b>section</b> 45: 2, 6 : 5 <b>security</b> 3:8, 2: 8, 20:2, 20:5 <b>see</b> 3: , 22: 9, 23: 3, 39:3, 45: , 45: 6, 46:8, 46: 0, 47:2, 47:3, 47: , 49:22, 50:5, 53:4, 54: 9, 56: 7, 56: 8, 6 : 2, 62:3, 75:5 <b>seeing</b> 53: 2, 67:20 <b>seen</b> 25: 5, 26: 7, 57: 2, 65:9, 65: 2 <b>sees</b> 58:6 <b>select</b> 3 :22 <b>self-explanatory</b> 64: 6 <b>send</b> 23:9, 23: 6, 39: 7, 48:8, 7 : 8 <b>sense</b> 5: 8, 6: , 6:8 <b>sent</b> 9: 8, 22:2 , 23:2, 48:5, 48: <b>separate</b> 7:3, 25:20 <b>sequentially</b> 58: 3 <b>sergeant</b> 30:6, 40: 0,	40: , 56:2, 56: 5 <b>series</b> 6:7 <b>set</b> 53: 9, 65:22 <b>setting</b> 63:20, 63:2 , 64: 2, 64: 3, 64: 7, 64: 8, 64:20, 65: 4, 66: <b>settings</b> 57:9, 65: <b>several</b> :7, 2:22, 5:7, 5: 5 <b>sex</b> 5:8 <b>shape</b> 54: , 54:2, 54:3, 54:8, 56: 8, 62:4, 69: 8, 74:22 <b>shared</b> 7: 6, 39:2, 6 :5 <b>shift</b> 2: 5 <b>should</b> 44:2 , 58:7, 58: 8, 75: 3 <b>show</b> 7: 4, 40:3, 42: 4, 56:22, 70: 6, 70:22 <b>showed</b> 59:20, 68:8, 68: 8, 72: , 72: 4, 72: 5 <b>showing</b> 3 :20, 55: 3, 68: 5, 69:8, 72:5 <b>shown</b> 9: 8, 22:2 , 23:8, 34: , 37:20, 47:	<b>shows</b> 42: 5, 46: , 55: <b>side</b> 26:2 <b>signature-lapgj</b> 77:2 <b>signified</b> 69: 7 <b>signing</b> 76:8 <b>similar</b> 52: 6, 53:22, 56: 8 <b>since</b> 5:2, 30:6 <b>sir</b> 5: , 5: 9, 6:2, 6:9 <b>site</b> 22: 2, 22: 5, 22: 7, 23: <b>situation</b> 35:2, 54: 2, 55: 8, 62: 4, 70: <b>size</b> 62:5 <b>slender</b> 46:9 <b>slide</b> 42: , 42: 2, 42: 4, 42: 5, 48: 5, 54:20, 55:2 , 56:3, 59: 7 <b>slides</b> 9: 5, 53:20, 53:2 , 56: 4, 6 :6 <b>slight</b> 49: 9, 50: <b>slightly</b> 26:4 <b>small</b> 46:8 <b>smaller</b> 62:5
--	---	---	--

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## Transcript of Yulonda Wyche

Conducted on April 23, 2021

36

smith :32, 77:6, 77:23 smuggle 74:4 snippet 62: 7 social 62:20, 62:2 some 5: 2, 7:7, 7:7, 7:9, 9:4, 27: 5, 28:22, 39:7, 39: 6, 49:6, 53:5, 54:7, 55: 3, 57:5, 57:6, 62:4, 65:9, 65: 2, 68:8, 69:3, 69: 7, 74: 9 someone 22: 6, 29: 5, 45:7 something 22: 5, 47:4, 47: 0, 59:8 sometime 9: 5 sometimes 22: 8, 25:7, 26: 2, 56:2 somewhat 64: sorry 9: 8, 3: , 8:2, 34:2 , 39:9, 70: 7, 70:20 sort 53:5, 56: 9, 69:3 southside 7: 6, 8:8 speaking 45:9 specific 7:3, 7:5,	24:7, 28:3, 28:7, 36:6, 36: 2, 4 :22, 42:3, 63:4 specifically 2 :2, 35: 3, 37: 6, 42: 0, 47: 5, 52: 9, 59:6 specifics 37:20 speculation 27:5, 29: 2, 30: 8, 5 :20, 58: 0, 59:4, 72:9 spoken 3:2 srobb@oag 2:23 staff 20:6, 20:2 , 25:3, 39: 2, 42:3, 42:6, 42: 0, 63: 4, 64:7, 7 :22 stand-alone 24:8 standard 66: 4 start 5:2 , 64: 8 started 28: state 2:22, 2:23, 9: , 4:8, 4:9, 2 :8, 22: 0, 22:22, 23:6, 26: 8, 26:20, 37: 2, 47: 5, 77:3 states : , 5:6 statewide 3:9, 20:2, 20: , 20: 5 statistics 4 : 4, 4 :22,	42:2 status 38:2 staunton 68: 4, 72: 8 step 75: 3 steps 58:2 , 65:20, 75:6 still 4: 5, 30:2, 30:4, 6 : 4 stipulate 4:4 stop 45: 6 stopped 73:20 stopping 75: 3 storage 28:3, 28:6, 28: 4, 28: 8 storing 27: 7 street 2:8, 2: 9 strike 29: 7, 37:2 , 48:7, 5 : 5, 68:22 string 69:20 strings 49:7 strip 50:22, 55:3 strips 62:6 studies 20:6 stuff 0: subject 34:4 submitted 2 :	suboxone 62:6 subsequently 7 : 8 subset 29:8 suite 2:8 super 44: supervision 63: 9 supervisor 4:2, 63: 5, 65:2 sure 8: 2, 6: , 6:4, 6: 0, 6: , 7: 4, 20:2, 2 : 9, 2 :22, 30:2, 40:8, 52:3, 52:5, 60: , 60:7, 73: 2 suspended 50:2 sussex 46: 7, 47: 9, 48: swearing 4:5 system 3:9, 24: , 24:8, 28:4, 32: <hr/> T <hr/> take 6:6, 8:7, 0: 4, :2, 5: 3, 5: 4, 24: 2, 26:6, 26: 2, 26: 6, 27: , 58:22, 60: 7, 60: 9, 73:2, 75:6 taken 7: 4, 25: 2,
--	---	--	--

## CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

37

40:22, 65: 8, 65:2 , 7 :5, 77:7, 77: , 77: 6 <b>takes</b> 28:5 <b>taking</b> 76:6 <b>talk</b> 39:7, 66:22 <b>talked</b> 74: 3 <b>talking</b> 7:4, 24:2 , 40: 3, 4 : 3, 45: , 49: 3, 6 :6 <b>tampon</b> 38: 4, 38: 6, 42: 6, 43:22, 44: , 44: 5, 45:9, 46:20, 47:3, 47:4, 47:5, 47: 0, 47: 4, 52: , 52: 6, 55:4, 55:6, 55: 6, 57: 6, 57: 9, 58:6, 58: 3, 59: , 59:7, 59:9, 59: , 59: 4, 59: 8, 59:2 , 6 :7, 63:5, 73: 5, 73:20 <b>tampons</b> 53: 9, 54:2, 63:4 <b>tape</b> 45:5, 45:7, 49:8, 54: , 54: 6, 55:5, 55: 3 <b>tech</b> 7:2 <b>technical</b> 9:5, 64: <b>technician</b> 2:28	<b>telephone</b> 68: 5 <b>tell</b> 5:2 , 22:9, 34:20, 37: 5, 37: 6, 39:7, 45:22, 48: 8, 49: , 52:22, 56: 7, 57:2, 62: , 63: 2, 68: 2, 69:7, 69: 4, 70: 0, 7 :2, 7 :2 , 72:2 <b>telling</b> 48: 5 <b>tells</b> 9:3, 56:2 <b>temporarily</b> 50:20 <b>ten</b> : 0, 5: 8, 6:5, 60: 9, 73:2 <b>terabyte</b> 28:4, 28: 0 <b>term</b> 24:3, 24:4 <b>terminated</b> 35: 4, 38: 7 <b>terms</b> 24:20, 27: 7, 64: <b>terrace</b> 7: <b>test</b> :2 <b>testified</b> 4:2 , 33:5, 33:9, 33: 8, 77: 0 <b>testify</b> 68:7, 72: 3 <b>testifying</b> 34:5 <b>testimony</b> 4:7, 4: 5, 4:20, 8:7,	27: 5, 34: 7, 35: 8, 38: 2, 52: 7, 73: 4, 77:8, 77: <b>testing</b> 20: 2, 2 :4, 2 :6, 2 : 0 <b>texas</b> 4: 0 <b>text</b> 23:6 <b>thank</b> 7:4 <b>thanks</b> 73:7 <b>thereafter</b> 77: 2 <b>thereto</b> 77: 8 <b>thing</b> 50: 3, 54: 6 <b>things</b> 22: 9, 44:22, 49:8, 56:22, 57:5, 57:6, 57: 0, 59: 3, 67: 6, 75: <b>think</b> 4: 8, 30:9, 43: 9, 47:8, 48: 2, 48: 9, 49:3, 49:8, 54: 4, 69: 3, 72: 2, 74: 4, 74: 9, 75: 9, 75:20, 75:2 <b>thinking</b> 34:2, 54: 6, 54: 7 <b>third</b> 4 :4, 4 :6 <b>through</b> 8: 6, 9:6, 9: 4, 9: 6, 0:4, : , 4:5, 20:20, 44: 3, 44: 9, 45: 7, 58: 3,	64:8, 73: 9 <b>thumb</b> 30: 3 <b>thumbnails</b> 3 : 8 <b>tie</b> 46: , 46: 4, 49:2, 49: 2, 49: 3, 50:4, 50:9, 53:5, 69: 9, 74:22 <b>ties</b> 49:7 <b>tight</b> 49:22 <b>time</b> 6:4, 0: 8, 2:7, 2: 4, 4: 9, 5:9, 9: 0, 9: , 23:4, 4 : 0, 44:4, 44:8, 47:20, 58:6 <b>times</b> 5: 8, 5:20, 6: , 22:20, 25:8, 26:5 <b>today</b> 5: 0, 5: 7, 6: 4, 5: 0, 23:22, 68:7, 73: 4 <b>together</b> 6:4, 4:20 <b>toilet</b> 55:4, 55: 2 <b>told</b> 28:4 <b>took</b> 3: 4, 40: 7, 40: 9, 43:3, 73:2 <b>top</b> 50:3 <b>totally</b> 6:5 <b>towards</b> 9: 5, 8: 2,
--	---	--	---

PLANET DEPOS

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## CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

38

44:2 , 45: 4, 46: , 54: 5, 6 : 3 <b>train</b> 9: 7, 9:20, 9:2 , 3:5, 4: 3, 4:20, 4:22, 5:3, 39: 2 <b>trained</b> 30:7, 75:4 <b>trainer</b> 9: 7, 9: 9, 9:20, 3:5, 4: 3, 4:20 <b>trainers</b> 9:2 <b>training</b> 3:9, :5, 2:4, 2:20, 4:6, 4: 3, 4:2 , 5: , 5: 3, 5: 7, 6: 5, 6:20, 7: , 7: 8, 9: 9, 22:2, 35:3, 37: 9, 39: 0, 43: , 48: 4, 57: 2, 59: 6, 69: 7, 74: 2 <b>trainings</b> 5:7 <b>transcript</b> 3: 9, 4:9 <b>transcription</b> 5: 7 <b>tried</b> 40:5, 45: 3 <b>trigger</b> 57: 3 <b>triggers</b> 75:2 <b>true</b> 4:7, 4: 6 <b>trumbo</b> 3:2 <b>truthful</b> 4:20	<b>try</b> 74:4 <b>trying</b> 58:3, 58: 2, 72:2 <b>turn</b> 7 : 5 <b>two</b> : 5, : 6, 47: , 48:2 , 53:7, 6 :8, 64: 0, 68: 9, 68:20, 7 :4 <b>type</b> 69: 7 <b>typewriting</b> 77: 3 <b>typically</b> 75:2 <hr/> <b>U</b> <hr/> <b>uh-huh</b> 24:2 <b>unable</b> 29: <b>uncommon</b> 74:8 <b>under</b> 4:7, 4: 6, 6: 8, 30:8, 43: 8, 63: 8, 77: 0, 77: 3 <b>understand</b> 5:9, 24:5, 58:4 <b>understanding</b> 27: 8, 28: 7, 40: 7, 40:2 , 4 :3, 46: , 73:22 <b>understood</b> 52: 7 <b>unique</b> 32:5, 32: 3 <b>unit</b> 5:9, 20: 7, 20: 8, 20:20, 66:6 <b>united</b> : , 5:6	<b>unknown</b> 59:8 <b>unrecoverable</b> 29:7, 29:8 <b>upper</b> 64: 3 <b>upward</b> 69:20 <b>urine</b> 2 : <b>usb</b> 24: , 24: 3, 24: 8 <b>use</b> 5: , 5:4, 6: 5, 7:9, 7: 0, 20:8, 24:3, 24:4, 3 :9, 32: 5, 32: 6, 34:6, 46:4, 74:4 <b>using</b> 26: 6, 44: , 44: 5 <b>utilize</b> 66:4 <b>utilized</b> 3 :6 <hr/> <b>V</b> <hr/> <b>v-d-o-c</b> 52:22, 54:2 , 62: 0 <b>va</b> 2:22, 2:23 <b>vaginal</b> 38:2, 74:4 <b>valerie</b> :32, 77:6, 77:23 <b>variances</b> 20:7 <b>various</b> 5: , 9:9, 22:22 <b>vcn</b> 9:2 <b>vcu</b> 9: , 0:4	<b>vehicle</b> 66:5 <b>verbal</b> 5: 4 <b>verbatim</b> 69: 0 <b>verified</b> 4: <b>versa</b> 42: 0 <b>vertical</b> 50: 2 <b>vertically</b> 46:9 <b>via</b> 23:4, 23:6, 23: , 24: 8 <b>vice</b> 42: 0 <b>videoconference</b> 2:4, 2: 4, 76:7, 76:9 <b>view</b> 25: 6, 25: 9, 26:2, 65: 6 <b>violation</b> 26:22 <b>virginia</b> :2, : 3, :23, 2:8, 2:9, 2: 8, 2:20, 5:7, 5:8, 7:2, 9: , 9:3, 4:4, 4:7, 62: 8 <b>virtually</b> :22 <b>visit</b> 20: 9, 22: 5 <b>visitation</b> 20: , 20: 7, 62:9 <b>visitor</b> 20:22, 25:3, 46: 7, 50: 8, 50: 9, 7 :22 <b>visitors</b> 20: 9, 32: 5, 40:4, 4 : 5,
--	---	---	---

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## CONTAINS CONFIDENTIAL INFORMATION

EXHIBIT 1

Transcript of Yulonda Wyche

Conducted on April 23, 2021

39

4 : 6, 4 :22, 45: 2 <b>visits</b> 22: 7 <b>vs</b> : <hr/> <b>W</b> <hr/> <b>waiving</b> 76:3, 76:5 <b>wake</b> 77:4 <b>want</b> 8:9, 7: 3, 8: , 29:4, 36: 4, 48:5, 73: 2 <b>wanted</b> 8:3, 22: 6 <b>warden</b> 66:7, 67: 8, 68:7, 68: 0, 69:7, 7 : <b>watch</b> 2: 6 <b>way</b> 4: 0, 5: 2, 23: 6, 24:9, 24: 2, 49:8, 67:6 <b>we'll</b> 7: 2, 39:7, 73:4 <b>we're</b> 6:9, 7:4, 23: 8, 40: 3, 43:2 , 45: 6, 5 : , 5 : 7, 53:4, 75: 9 <b>we've</b> 48:20, 6 :8, 65:9, 65: 2, 74: 3 <b>wearing</b> 46: 9, 73:20 <b>website</b> 43:7 <b>went</b> 7: 6	<b>weren't</b> 23: <b>western</b> , 6 <b>whatever</b> 28: 0, 32: 0, 73:5, 75:6 <b>whereby</b> 6: 6 <b>whereupon</b> 76:6, 76:8 <b>whether</b> 25:3, 28:2 , 29:7, 40:9, 44: 0, 57:8, 59: 0 <b>whichever</b> 32: 0, 32: 4 <b>white</b> 65: <b>whitt</b> 29:20 <b>whole</b> 60: 8 <b>window</b> 26:3, 26:4 <b>wish</b> 8:8 <b>wishing</b> 20: 9 <b>within</b> 66: <b>without</b> 59: 2 <b>witness</b> 4:5, 4:6, 4: , 4: 7, 33: 0, 76:2, 76:9, 77:8, 77: <b>woman</b> 37:22, 4 :5, 4 : <b>women</b> 4 : 7 <b>woodson</b> 2:27, 68: 0, 7 : <b>words</b> 9: 8	<b>work</b> 3:22, 22:9, 22: 3, 58: 3, 7 :4 <b>working</b> 0: 7, 26:3, 26:4 <b>works</b> 60: 9, 60:2 <b>workstation</b> 7 :4 <b>wrapped</b> 45:7, 55:4, 55: 2 <b>write</b> 4 :6 <b>written</b> 55:9, 66: 0 <b>wrong</b> 54: , 62: 7 <b>wrote</b> 4 : 0 <b>wyche</b> :2 , 3:2, 4: 2, 4: 4, 4: 9, 5:2, 6: 2, 73: <hr/> <b>X</b> <hr/> <b>x</b> :5, : 7 <b>x-ray</b> 3:8, 42:22 <hr/> <b>Y</b> <hr/> <b>yeah</b> 2 :5, 24:9, 46:6, 49: 6, 50:2 <b>year</b> 29:5 <b>yourself</b> 8: 9 <b>yulonda</b> :2 , 3:2, 4: 2, 4: 9, 6: 2 <hr/> <b>Z</b> <hr/> <b>zoom</b> 56: 6	<hr/> <b>.</b> <hr/> <b>.5</b> : <hr/> <b>0</b> <hr/> <b>00</b> 73:4 <b>00087</b> : <hr/> <b>1</b> <hr/> <b>1</b> :25, :30, 4:2 <b>11</b> 5: 0, 6:7, 6: 0 <b>1109</b> 2:2 <b>12</b> :25, 4:2 <b>126</b> 44: 9 <b>13</b> 76:6 <b>14</b> 5:8 <b>140</b> 2:8 <b>15</b> 6: 0, 73:3 <b>17</b> 3:9 <b>1996</b> 7: 0 <b>19981560010</b> 77:24 <b>1999</b> 8:6 <hr/> <b>2</b> <hr/> <b>2</b> 60:20 <b>20</b> : , :8 <b>2002</b> 8: 9 <b>2007</b> 8:2
---	---	--	--

PLANET DEPOS

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Transcript of Yulonda Wyche  
Conducted on April 23, 2021

40

2008	367574		
9:	:28		
2014	4		
9:5	42		
2016	4 :2		
8:9, 9: 3,	44		
0:9, 0: 2	42:		
2017	445.1		
9: 5, 3:4,	66:20		
5:2	47		
2018	40:3		
9:9, 0: ,	48		
8: 3, 55: 8	40:6		
2019	4848		
8: 3, 20: 0,	2: 0		
29:4, 3 :6,	5		
40: , 62: 2	50		
202	5:20		
2: 9	5609		
2021	7:		
:24, 77:20	6		
22	648		
3: 4	2: 0		
23	676		
:24	62:6		
23219	6th		
2:9, 2:20	77:20		
23234	7		
7:2	73		
25	3:4		
6:	75		
29	3:3		
60:20	77		
3	:30		
73:4, 76:6	786		
302	2:2		
2:8	8		
346	804		
52:22	2: 0, 2:2		
347	9		
45:22, 52:22,	9th		
53:6	2: 9		
353			
54:2			
360			
62:			